Moran League of Grenter New Brunswick General V. The Mayor and Council of the Borough of (Edison) 3-19-1975 Carteret

Interrogatories demanding the township Committee of Edison, to provide income level and race statistics of housing units," municipal employees,

With answers and achibits

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Various exhibits of statistics and even a map is attatched. These exhibits are faled and disproportionate in size compared to the other Pieces of Paren

Pages 27

OFFICE OF THE TOWNSHIP ATTORNEY ROLAND A. WINTER, Esq.



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EDISON, NEW JERSEY 08817 Telephone 738-1300

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MAR 1 9 1975

Township of Edison Middlesex County, New Jersey 08817

March 13, 1975

Baumgart & Ben-Asher, Esqs. 134 Evergreen Place East Orange, New Jersey 07018

> Re: Urban League of Greater New Brunswick vs. Carteret, et al

Gentlemen:

Enclosed herewith for service upon you please find an original and copy of Answers to Interrogatories by the Township of Edison.

Kindly acknowledge receipt of same on the copy of the letter enclosed for your convenience.

I have likewise served all my adversaries with copies of Answers to Interrogatories.

Very truly yours,

Roland A. Winter

RAW/f1f enc1. CC: All attorneys of record.

MAR 1 9 1975

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-BAUMGART & BEN-ASHER Attorneys for Plaintiffs 134 Evergreen Place East Orange, New Jersey 07018 201-677-1400

MARTIN E. SLOANE DANIEL A. SEARING ARTHUR WOLF Of Counsel National Committee Against Discrimination in Housing, Inc. 1425 H Street, N.W. Washington, D.C. 20005 202-783-8150

> SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION - MIDDLESEX COUNTY DOCKET NO. C-4122-73

URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al.

Plaintiffs,

THE MAYOR AND COUNCIL OF THE BOROUGH OF CARTERET, et al.

v.

Civil Action

INTERROGATORIES

Defendants

To:

ROLAND WINTER, Esq. 940 Amboy Avenue Edison, New Jersey 08817

 DEMAND is hereby made of the defendant TOWNSHIP COMMITTEE OF THE TOWNSHIP OF EDISON for Certified
Answers to the following interrogatories within the time prescribed by the Rules of this Court.

:

1. Please provide the most current statistics available on the population of the municipality, by income level and race (categorized as white, black,

spanish-speaking, other), citing source.

There are 65,467 White; 1,367 Negro; 30 Indian; 193 "Other Specified" and 63 "Non-Specified". The above figures were taken from a 1970 census report prepared by the Middlesex County Planning Board under the direction of Douglas S. Powell and furnished to the Township on Nov. 24, 1971 by him. The sources cited by Mr. Powell for these figures is the U.S. Census of 1960. The Township has no records to indicate or support any statistics that would categorize the population by income level. 2. Provide for each public school within the

municipality, the number of pupils enrolled, with sub-

totals for whites, blacks, spanish-speaking and other,

giving school name, location, grades served and area. The answer is provided in Exhibits "A" and "A-1" attached hereto.

i. Provide the number of dwellings presently within the municipality in each of the following value categories, as determined from the property tax rolls.

(a) Single family homes under \$15,000 The answer to this interrogatory and all sub-paragraphs is contained in Exhibit "B" attached hereto.

(b) \$15,000 to \$25,000

(c) \$25,000 to \$35,000

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(d) Over \$35,000

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4. Provide the number of multi-family units

in each of the following rental categories and ranges. Answer: Edison has no such records or information in its files or avail-. able to it. Rental Range

Туре	Under \$100	\$100 - \$149	\$150 - \$199	\$200 - \$249	\$250 & Over
Efficiency	•				
One-Bedroom					
Two-Bedroom					
Three or more Bedrooms		4 			

5. Provide the total number of mobile homes in municipality that exist as conforming uses under current

zoning ordinance.

Answer: See Exhibit "C" attached hereto. The units described in Exhibit "C" are not "conforming uses"; but, as individual trailer pads become vacant, they are permitted to be reoccupied without variances. In other words, only the trailer parks are non-conforming uses.

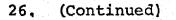
6. Provide the number of housing units within the municipality that are below the standards required for new construction or rehabilitation in local building codes and housing standards ordinance. Indicate how many are currently occupied and how many vacant.

Answer: ZERO.

. 7. Provide for each department in the municipality the number of municipal employees by job category, race, and annual salary or hourly wage.

3

See Exhibit "G" attached hereto:



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BAUMGART & BEN-ASHER Attorneys for Plaintiff

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By DAVID Η. BEN ASHER

A Member of the Firm

CERTIFICATION

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

- 13 -

TOWNSHIP COMMITTEE OF THE By TOWNSHIP OF EDISON

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DATED: