Interrogatory of the Mayor and council of the Borough of Sayreviller. This demands statistics of housing units, Public schools income.

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

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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;

ALAN KARCHER, Esq. 167 Main Street Sayreville, New Jersey 08872

• DEMAND is hereby made of the defendant MAYOR AND COUNCIL OF THE BOROUGH OF SAYREVILLE for Certified Answers to the following interrogatories within the time prescribed by the Rules of this Court.

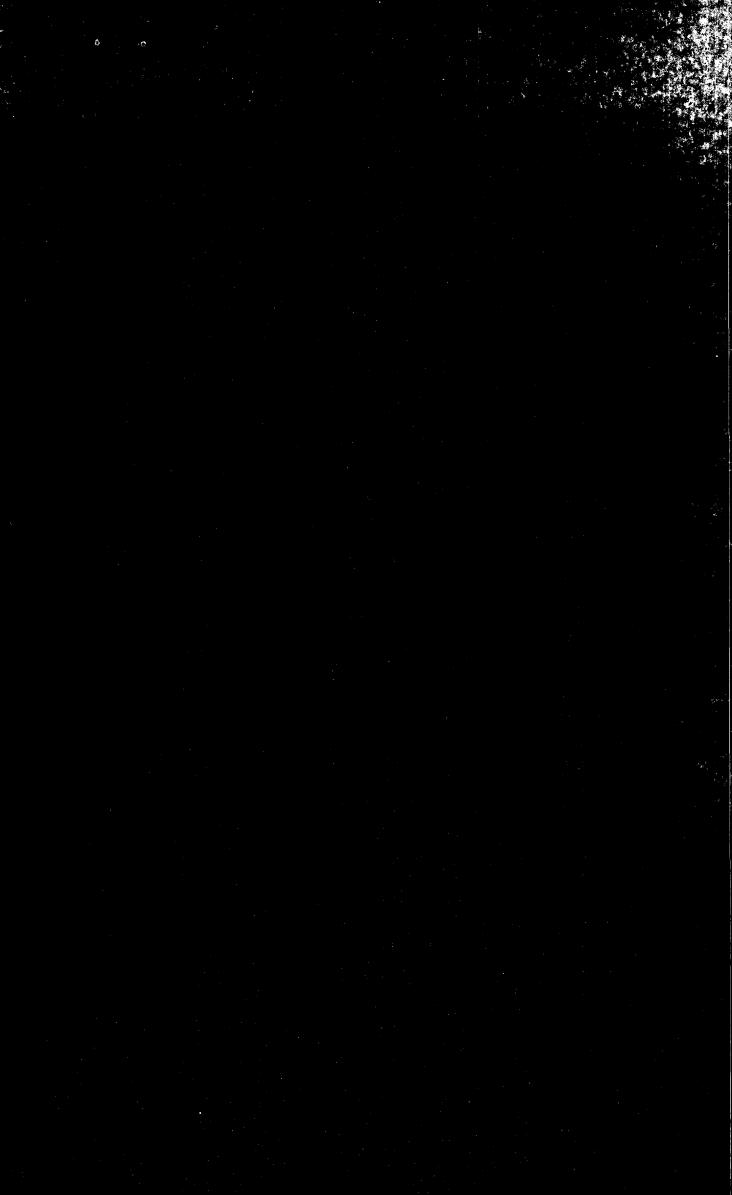
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 Please provide the most current statistics available on the population of the municipality, by income level and race (categorized as white, black,



Provide the number of multi-family units in each of the following rental categories and ranges. L.L.

Rental Range				
Under \$100	\$100 ~ \$149	\$150 - \$199	\$200 - \$249	\$250 & Over
•	SEE ANSWER	SET FORTH	IN	
	RIDER NO. 1	L ANNEXED 1	IERETO	
	AND MADE A	PART HERE	DF.	
	i			
	Under	Under \$100 - \$100 \$149 SEE ANSWER RIDER NO. 1	Under \$100 - \$150 - \$100 \$149 \$199 SEE ANSWER SET FORTH RIDER NO. 1 ANNEXED 1	Under \$100 5150 \$200 5249 \$100 \$149 \$199 \$249 SEE ANSWER SET FORTH IN

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

zoning ordinance.

There are no mobile homes (occupied for residential purposes) that the Borough recognizes as conforming uses under current zoning ordinance.

Provide the number of housing units within 6. 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.

The Borough of Sayreville does not know of any housing units in the municipality which are below the standards indicated. All housing in Sayreville, so far as this defendant knows meets reasonable standards for new construction or rehabili-tation and are all occupied.

Provide for each department in the munici-7.

pality the number of municipal employees by job category,

race, and annual salary or hourly wage.

This defendant does not have this information, since we have never discriminated as to race and do not know of any source where this specific information is categorized in the manner indicated. As to the remainder of the question requiring us to give the number of employees, job category and annual salary and hourly wage for each municipal employee, we feel that this is an improper question, since it is vexatious and burdensome.

Moreover, this information is a matter of public record in the office of the Borough Treasurer, where the records may be examined and copied at any time during the regular business hours of the day, from 9:00 A.M. to 5:00 P.M.

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This information is not within the possession or competence of the defendant Borough of Sayreville in-the manner specified. We deny that it has any relevancy or materiality to this suit.

26. (Continued)

BAUMGART & BEN-ASHER Attorneys for Plaintiff

By O

DAVID H. 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.

> MAYOR AND COUNCIL OF THE By BOROUGH OF SAYREVILLE

JAN 22 1975 DATED:

And the second second

John E. Czernikowski, Mayor

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