

ML - Cranbury

13-Jan-1984

Garfield and Company v. Cranbury

- Plaintiff's Garfield and Company's Interrogatories
- Cover letter to counsel

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WARREN, GOLDBERG, BERMAN & LUBITZ  
A Professional Corporation  
112 Nassau Street  
P.O. Box 645  
Princeton, New Jersey 08542  
(609) 924-8900

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MIDDLESEX COUNTY

PLAINTIFF, GARFIELD & COMPANY  
FIRST SET OF INTERROGATORIES

~~Attorneys for Plaintiff, Garfield & Company~~

LAWRENCE ZIRINSKY,

Plaintiff,

CIVIL ACTION

vs.

THE TOWNSHIP COMMITTEE OF THE TOWNSHIP OF  
CRANBURY, A Municipal Corporation, and  
THE PLANNING BOARD OF THE TOWNSHIP OF  
CRANBURY,

DOCKET NO.: L-079309-83 P.W.

Defendants.

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JOSEPH MORRIS and ROBERT MORRIS,

Plaintiffs,

DOCKET NO.: L-054117-83

vs.

TOWNSHIP OF CRANBURY IN THE COUNTY OF  
MIDDLESEX, A Municipal Corporation of the  
State of New Jersey,

Defendant.

-----

GARFIELD & COMPANY,

Plaintiff,

DOCKET NO.: L-055956-83 P.W.

vs.

MAYOR and THE TOWNSHIP COMMITTEE OF THE  
TOWNSHIP OF CRANBURY, A Municipal Corporation,  
and the members thereof; PLANNING BOARD OF  
THE TOWNSHIP OF CRANBURY, and the members  
thereof,

Defendants.

-----

CRANBURY DEVELOPMENT CORPORATION, A  
Corporation of the State of New Jersey,

Plaintiff,

DOCKET NO.: L-59643-83

vs.

CRANBURY TOWNSHIP PLANNING BOARD and the  
TOWNSHIP COMMITTEE OF THE TOWNSHIP OF  
CRANBURY,

Defendants.

---

BROWNING-FERRIS INDUSTRIES OF SOUTH JERSEY,  
INC., A Corporation of the State of New  
Jersey, RICHCRETE CONCRETE COMPANY, a  
Corporation of the State of New Jersey,  
and MID-STATE FILIGREE SYSTEMS, INC.,  
a Corporation of the State of New Jersey,

Plaintiffs,

vs.

DOCKET NO.: L-058046-83 P.W.

CRANBURY TOWNSHIP PLANNING BOARD and  
THE TOWNSHIP COMMITTEE OF THE TOWNSHIP  
OF CRANBURY,

Defendants.

---

URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al.

Plaintiffs,

vs.

DOCKET NO.: C-4122-73

THE- MAYOR and COUNCIL OF THE BOROUGH OF  
CARTERET, et al.,

Defendants.

---

CRANBURY LAND COMPANY, a New Jersey Limited  
Partnership,

Plaintiff,

vs.

DOCKET NO.: L-070841-83

CRANBURY TOWNSHIP, A Municipal Corporation  
of the State of New Jersey located in  
Middlesex County, New Jersey,

Defendant.

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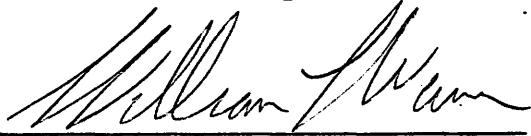
TO: Joseph L. Stonaker, Esquire  
Attorney for The Planning Board of the Township of Cranbury,  
and the members thereof.  
41 Leigh Avenue  
Princeton, New Jersey 08540

SIR:

PLEASE TAKE NOTICE THAT Garfield & Company hereby requests that The Planning Board of the Township of Cranbury answer the following Interrogatories under oath within the time prescribed by the Rules of Court.

WARREN, GOLDBERG, BERMAN & LUBITZ  
A Professional Corporation

BY:



WILLIAM L. WARREN, ESQUIRE

DATED: January 13, 1984  
Princeton, New Jersey

WARREN, GOLDBERG, BERMAN & LUBITZ  
A Professional Corporation  
112 Nassau Street  
P.O. Box 645  
Princeton, New Jersey 08542  
(609) 924-8900

~~Attorneys for Plaintiff, Garfield & Company~~

LAWRENCE ZIRINSKY,

Plaintiff,

vs.

THE TOWNSHIP COMMITTEE OF THE TOWNSHIP OF  
CRANBURY, A Municipal Corporation, and  
THE PLANNING BOARD OF THE TOWNSHIP OF  
CRANBURY,

Defendants.

-----  
JOSEPH MORRIS and ROBERT MORRIS,

Plaintiffs,

vs.

TOWNSHIP OF CRANBURY IN THE COUNTY OF  
MIDDLESEX, A Municipal Corporation of the  
State of New Jersey,

Defendant.

-----  
GARFIELD & COMPANY,

Plaintiff,

vs.

MAYOR and THE TOWNSHIP COMMITTEE OF THE  
TOWNSHIP OF CRANBURY, A Municipal Corporation,  
and the members thereof; PLANNING BOARD OF  
THE TOWNSHIP OF CRANBURY, and the members  
thereof,

Defendants.

-----  
CRANBURY DEVELOPMENT CORPORATION, A  
Corporation of the State of New Jersey,

Plaintiff,

vs.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MIDDLESEX COUNTY

PLAINTIFF, GARFIELD & COMPANY  
FIRST SET OF INTERROGATORIES

CIVIL ACTION

DOCKET NO.: L-079309-83 P.W.

DOCKET NO.: L-054117-83

DOCKET NO.: L-055956-83 P.W.

DOCKET NO.: L-59643-83

CRANBURY TOWNSHIP PLANNING BOARD and the  
TOWNSHIP COMMITTEE OF THE TOWNSHIP OF  
CRANBURY,

Defendants.

---

BROWNING-FERRIS INDUSTRIES OF SOUTH JERSEY,  
INC., A Corporation of the State of New  
Jersey, RICHCRETE CONCRETE COMPANY, a  
Corporation of the State of New Jersey,  
and MID-STATE FILIGREE SYSTEMS, INC.,  
a Corporation of the State of New Jersey,

Plaintiffs,

vs.

DOCKET NO.: L-058046-83 P.W.

CRANBURY TOWNSHIP PLANNING BOARD and  
THE TOWNSHIP COMMITTEE OF THE TOWNSHIP  
OF CRANBURY,

Defendants.

---

URBAN LEAGUE OF GREATER NEW BRUNSWICK, et al.

Plaintiffs,

vs.

DOCKET NO.: C-4122-73

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

Defendants.

---

CRANBURY LAND COMPANY, a New Jersey Limited  
Partnership,

Plaintiff,

vs.

DOCKET NO.: L-070841-83

CRANBURY TOWNSHIP, A Municipal Corporation  
of the State of New Jersey located in  
Middlesex County, New Jersey,

Defendant.

---

TO: William C. Moran, Jr., Esquire  
Attorney for the Mayor and The Township Committee of the  
Township of Cranbury  
Cranbury-South River Road  
Cranbury, New Jersey 08512

SIR:

PLEASE TAKE NOTICE THAT Garfield & Company hereby requests that the Mayor and The Township Committee of the Township of Cranbury answer the following Interrogatories under\* oath within the time prescribed by the Rules of Court.

WARREN, GOLDBERG, BERMAN & LUBITZ  
A Professional Corporation

BY: 

WILLIAM L. WARREN, ESQUIRE

DATED: January 13, 1984  
Princeton, New Jersey

## I. INSTRUCTIONS

A. Each Interrogatory shall be construed to include information within respondent's knowledge, possession, custody or control or the knowledge, possession, custody or control of respondent's agents as of the date of its answers to these Interrogatories as well as any information, knowledge, date, document or communication that subsequently is obtained or discovered and that demonstrates that any answer originally provided in response to these Interrogatories was incorrect or incomplete in any way when made or subsequently became incorrect or incomplete; such supplemental information to be promptly supplied.

B. For each separate Interrogatory identify each of those individuals with whom you consulted, upon whom you relied, or who otherwise constituted a source of information for you in connection with the preparation of your answers to these Interrogatories.

C. In answering these Interrogatories furnish all information that is known to you or your agents. If any of these Interrogatories cannot be answered in full, answer them to the fullest extent possible, detailing the reasons for your inability to answer the remainder and stating fully the information, knowledge, or belief you now have concerning the unanswered portions.



1. State as precisely as possible the number of Development Credits which exist in the Township of Cranbury pursuant to that Township's Land Development Ordinance.

2. Detail the factual basis and methodology used in determining the number of Development Credits stated in response to the previous Interrogatory.

3. State as precisely as possible the price that you anticipate or estimate that a single Development Credit will bring on the open market; four Development Credits; 100 Development Credits; 200 Development Credits; 400 Development Credits; 600 Development Credits; 800 Development Credits.

4. Detail the factual basis and methodology used in determining the amounts stated in response to the previous Interrogatory.

5. If you are unable to provide a price for any number of the Development Credits in response to Interrogatory #4 above, detail the reasons for your inability to do so.

WARREN, GOLDBERG, BERMAN & LUBITZ

A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

GEORGE WARREN\*  
DAVID J. GOLDBERG  
RONALD BERMAN  
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(609) 394-7141

\*MEMBER N.J. AND N.Y. BAR

PLEASE REPLY TO: PRINCETON

January 13, 1984

Mr. William C. Moran, Jr., Esquire  
Huff, Moran and Balint  
Cranbury-South River Road  
Cranbury, New Jersey 08512

Mr. Joseph L. Stonaker, Esquire  
Stonaker and Stonaker, Esquires  
41 Leigh Avenue  
P.O. Box 570  
Princeton, New Jersey 08540

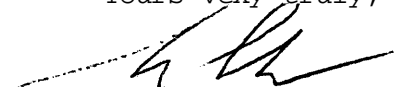
Re: Garfield and Company v. Mayor and  
The Township Committee of the Township  
of Cranbury, et al.  
Docket No.: L-055956-83 P.W.

Dear Sirs:

Enclosed please find an original and three copies of plaintiff Garfield and Company^ Interrogatories in the above-captioned matter. In addition to providing Garfield and Company with responses to these Interrogatories, please provide us with copies of your responses to all other Interrogatories and Production Demands propounded upon you in the consolidated proceeding. By this letter I am requesting counsel for Lawrence Zirinsky, Cranbury Development Corporation, Browning-Ferris Industries of South Jersey, Inc., Cranbury Land Company and Joseph and Robert Morris to provide me with copies of all Interrogatories and Production Demands which they have propounded in the consolidated action.

A copy of this letter and the enclosed Interrogatories is being sent to each counsel on the accompanying listing.

Yours vexy truly,



William L. Warren

WLW/st

SERVICE LISTING - GARFIELD & COMPANY

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Attorney for Plaintiff, Urban League of Greater New Brunswick

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Attorney for Defendant, Township of South Brunswick

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Attorney for Defendant, Township of South Brunswick

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Company, a corporation of the State of New Jersey, and Mid-State  
Filigree Systems, Inc., a corporation of the State of New Jersey