

ML - Cranbury

20-Jan-1984

Request for admissions

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Attorneys for Plaintiff, Garfield & Company

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MIDDLESEX COUNTY

REQUEST FOR ADMISSIONS

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.

JOSEPH MORRIS and RdBERT 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,

CHANCERY DIVISION
MIDDLESEX COUNTY

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, Esquire
HUFF, MORAN AND BALINT
Attorneys for Defendants, The Mayor and The Township Committee
of the Township of Cranbury
Cranbury-South River Road
Cranbury, New Jersey 08512

Joseph L. Stonaker, Esquire
STONAKER AND STONAKER, ESQUIRES
Attorneys for Defendant, The Planning Board of the Township
of Cranbury
41 Leigh Avenue, P.O. Box 570
Princeton, New Jersey 08540

PLEASE TAKE NOTICE that plaintiff, Garfield & Company, makes Request for Admissions pursuant to Rule 4:22-1.

1. Garfield & Company is the owner of approximately 220 acres of land located on Half Acre Road in the Township of Cranbury.

2. Garfield & Company is the owner of certain land located in the Township of Cranbury identified on the tax map of that Township as Block 5, Lot 9; Block 7, Lot 11 and Block 7, Lot 10..

3. The land owned by Garfield & Company in Cranbury described in paragraphs 1 or 2 above is located in a growth zone designated by the State Development Guide Plan.

4. The A-100 Agricultural Zone as defined in the Land Development Ordinance of Cranbury Township consists of less than 4,000 acres.

5. In order to develop its approximately 220 acres of property described in paragraphs 1 or 2 above to a density of four units per acre, Garfield &

Company must purchase at least 1,500 acres worth of development credits, if not more.

6. In order to develop its approximately 220 acres of property described in paragraphs 1 or 2 above to a density of five units per acre, Garfield & Company must purchase at least 1,500 acres worth of development credits, if not more.

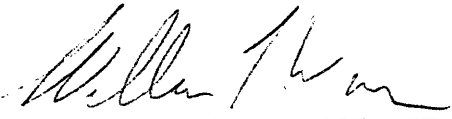
7. No established market exists for the purchase of development credits created by the Land Development Ordinance of Cranbury Township.

8. Garfield & Company's land as described in paragraphs 1 or 2 above is suitable for high density development.

9. The number of development credits available pursuant to the Land Development Ordinance of Cranbury Township is not likely to exceed about 1,500.

WARREN, GOLDBERG, BERMAN & LUBITZ
Attorneys for Plaintiff, Garfield & Co.,

BY:



WILLIAM L. WARREN

DATED: January 20, 1984