

AMB

10-13-81

letter re: pretax memo

- w/ pretax memo by TRP General Auth.

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J. ALBERT MASTRO

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October 9, 1981

RECEIVED

OCT 13 1981

SOMERSET COUNTY
ASSIGNMENT CLERK

William J. Wintermute, Sr.
Assignment Clerk
Somerset County Court House
Somerville, NJ 08876

Re: Timber Properties vs. The Township of
Warren, et als, Docket No. L-67820-80 P.W.

Dear Mr. Wintermute:

I am enclosing original and two copies of Pretrial Memorandum of Defendant, Warren Township Sewerage Authority in the above matter.

Very truly yours,

J. Albert Mastro
J. Albert Mastro

JAM:cf

Enclosures

cc: Raymond R. Trombadore, Esq.
John E. Coley, Jr., Esq.
Eugene W. Jacobs, Esq.

Attorney(s): J. Albert Mastro, Esq.

Office Address & Tel. No.: 7 Morristown Road, Bernardsville, NJ 07924 (201) 766-2720

Attorney(s) for Defendant, Warren Township Sewerage Authority.

TIMBER PROPERTIES, a corporation of
the State of New Jersey,

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION
SOMERSET COUNTY

Plaintiff(s)

vs.

THE TOWNSHIP OF WARREN, a municipal
corporation of the State of New Jersey,

THE PLANNING BOARD OF THE TOWNSHIP OF
WARREN, and THE WARREN TOWNSHIP
SEWERAGE AUTHORITY.

Defendant(s)

Docket No. L-67820-80 P.W.

CIVIL ACTION

PRETRIAL MEMORANDUM OF
DEFENDANT, WARREN TOWNSHIP
SEWERAGE AUTHORITY

1. NATURE OF ACTION: Action in lieu of prerogative writ attacking the validity of defendant Township's zoning for the subject property, seeking rezoning of plaintiff's premises for multiple family residential use and seeking additional sewage capacity from defendant Sewerage Authority in its Stage V
2. ADMISSIONS AND STIPULATIONS: Sewage Treatment Plant.

See No. 9

3-4. FACTUAL AND LEGAL CONTENTIONS: (Annexed hereto).
(attached)

5. DAMAGE AND INJURY CLAIMS: N/A

6. AMENDMENTS: None

7. ISSUES AND EVIDENCE PROBLEMS:

Legality and reasonableness of Sewerage Authority's policy in allocation of sewage capacity.

8. LEGAL ISSUES ABANDONED: None

9. EXHIBITS: Warren Township Development Regulations Ordinance (zoning and land subdivision); official records of defendant Sewerage Authority related to Stage V Treatment Plant construction.

10. EXPERT WITNESSES: No limit

11. BRIEFS: As directed by the Court.

12. ORDER OF OPENING AND CLOSING: Usual

13. ANY OTHER MATTERS AGREED UPON: Discovery to continue up to 10 days prior to trial.

14. TRIAL COUNSEL: J. Albert Mastro, Esq.

15. ESTIMATED LENGTH OF TRIAL: Two weeks

16. WEEKLY CALL OR TRIAL DATE:

17. ATTORNEYS FOR PARTIES CONFERRED ON MATTERS THEN AGREED UPON:

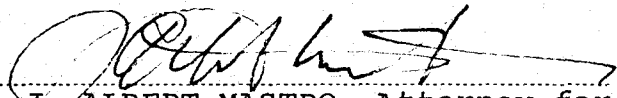
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18. IT IS HEREBY CERTIFIED THAT ALL PRETRIAL DISCOVERY HAS BEEN COMPLETED, except as indicated in paragraph 13.

19. PARTIES WHO HAVE NOT BEEN SERVED: None

PARTIES WHO HAVE DEFAULTED: None

Dated: October 9, 19 81.

By 
J. ALBERT MASTRO, Attorney for
Warren Township Sewerage Authority