

AMG

6-29-84

Answer to Counterclaim
- w/ service papers

PS# 5
pi # 3222

AM000162A

FILED

JUL 2 1984

M. DEAN HAINES, CLERK
COUNTY OF OCEAN

BRENER, WALLACK & HILL
2-4 Chambers Street
Princeton, New Jersey 08540
(609) 924-0808
Attorneys for Plaintiff

Plaintiff	:	SUPERIOR COURT OF
	:	NEW JERSEY
SHAINEE CORPORATION	:	LAW DIVISION-
	:	SOMERSET COUNTY/
	:	OCEAN COUNTY
vs.	:	<u>(Mt. Laurel II)</u>
	:	
	:	DOCKET NO. L-034351-84
Defendants	:	
	:	CIVIL ACTION
TOWNSHIP OF WARREN a municipal	:	
corporation of the State of New Jersey,	:	ANSWER TO COUNTERCLAIM
located in Somerset County, New Jersey,	:	
THE TOWNSHIP COMMITTEE of the	:	
TOWNSHIP OF WARREN, THE	:	
PLANNING BOARD OF THE TOWNSHIP	:	
OF WARREN and the SEWERAGE	:	
AUTHORITY OF THE TOWNSHIP	:	
OF WARREN	:	

Plaintiff, The SHAINEE CORPORATION (hereinafter referred to as "Plaintiff"), a Corporation organized under the laws of the State of New Jersey and having an office at 2-4 Chambers Street, Princeton, New Jersey 08540, by way of answer to Counterclaim raised by defendants, Township of Warren says:

1. The plaintiff admits the allegations of Paragraph 1 of the Counterclaim.
2. As to the allegations in Paragraph 2 of the Counterclaim, the plaintiff was incorporated in May, 1984, and thus could not be aware of events in January, 1984.

3. As to the allegations in Paragraph 3 of the Counterclaim, the plaintiff admits knowledge of the referenced case.

4. As to the allegations contained in Paragraph 4 of the Counterclaim, plaintiff admits filing its present case on May 25, 1984, but denies any allegation of delay.

5. Plaintiff denies the allegations in Paragraph 5.

6. Plaintiff admits it decided any attempt to obtain relief directly from defendants would be futile, and denies the remainder of the allegations contained in Paragraph 6 of the Counterclaim.

7. Plaintiff admits it decided any attempt to obtain relief directly from defendants would be futile, but denies any other allegation contained in Paragraph 7 of the Counterclaim.

8. Plaintiff denies the allegations in Paragraph 8 of the Counterclaim as being an unsupported conclusion of law put forth by defendants.

9. Plaintiff admits the allegations contained in Paragraphs 9 and 10 of the Counterclaim.

10. Plaintiff denies the allegations contained in Paragraph 11 of the Counterclaim.

11. Plaintiff is without sufficient knowledge to form an opinion as to the allegations of Paragraph 12.

12. Plaintiff denies the allegations of Paragraph 13.

13. Plaintiff is without sufficient information to form an opinion as to the allegations of Paragraph 14.

WHEREFORE, plaintiff demands relief as requested in its Complaint and a dismissal of the Counterclaim.

Date:

June 29, 1984

BRENER, WALLACK & HILL
Attorneys for Plaintiff

By:

Thomas J. Hall

Certification

I hereby certify that the within Answer to Counterclaim has been filed and served in accordance with R. 4:6-1.

Date:

June 29, 1984

Thomas J. Hall

file

BRENER, WALLACK & HILL
ATTORNEYS AT LAW
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PRINCETON, NEW JERSEY 08540

(609) 924-0808

RECEIVED

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JUL 3 1984

JUDGE SERPENTELLI'S CHAMBERS

* MEMBER OF N. J. & D. C. BAR
** MEMBER OF N. J. & PA. BAR
*** MEMBER OF N. J. & N. Y. BAR
**** MEMBER OF N. J. & FLA. BAR

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FILE NO.
JUL 2 1984

M. DEAN HAINES, CLERK
COUNTY OF OCEAN

June 29, 1984

- HARRY BRENER
- HENRY A. HILL
- MICHAEL D. MASANOFF**
- ALAN M. WALLACK*
- SUZANNE M. LAROBARDIER
- ROBERT W. BACSO, JR.*
- EDWARD M. BERNSTEIN*
- MARILYN S. SILVIA
- THOMAS J. HALL
- ROCKY L. PETERSON
- MICKI JAN ISLER
- MICHAEL J. FEEHAN

Mr. John Mayson
Clerk, Superior Court of New Jersey
CN 971
Trenton, NJ 08625

Re: Shainee v. Warren Township et al.
Docket No. L-034351-84

Dear Sir/Madam:

Enclosed please find the following documents in regard to the above-referenced matter.

- | | |
|--|---|
| <input type="checkbox"/> Complaint | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Summons | <input type="checkbox"/> Request to Enter Default and Certification |
| <input type="checkbox"/> Proof of Filing/Mailing | <input type="checkbox"/> Pre-trial Memorandum |
| <input checked="" type="checkbox"/> Answer to Counterclaim | <input type="checkbox"/> Brief |
| <input type="checkbox"/> Answer and Counterclaim | <input type="checkbox"/> Interrogatories |
| <input type="checkbox"/> Answer/Counterclaim/Jury Demand | <input type="checkbox"/> Release |
| <input type="checkbox"/> Notice of Motion | <input type="checkbox"/> Notice to Take Oral Depositions |
| <input type="checkbox"/> Order | <input type="checkbox"/> Request for Production of Documents |
| <input type="checkbox"/> Proposed Order | <input type="checkbox"/> |
| <input type="checkbox"/> Affidavit | <input type="checkbox"/> |
| <input type="checkbox"/> Affidavit of Proof & Non-Military Service | <input type="checkbox"/> |
| <input type="checkbox"/> Certification | <input type="checkbox"/> |
| <input type="checkbox"/> Judgment | <input type="checkbox"/> |

check in the amount of \$

Will you please:

- File and return a filed copy to us in the enclosed envelope.
- Sign and return to us for filing.
- Have signed by the appropriate judge and return to us for filing.
- Serve.
- Have answered and return to us within the time provided by the Rules.
- Please mark our Motion for

Very truly yours,
BRENER, WALLACK & HILL

cc: all parties on enclosed list By: _____
Enclosure Thomas J. Hall

Mr. Dean Haines
County Clerk
Ocean County
104 Court House
CN 2191
Toms River, NJ 08754

Judge Eugene D. Serpentelli
Judge, Superior Court of NJ
Ocean County Court House
Toms River, NJ 08753

Mr. Lawrence R. Olsen
Clerk, County of Somerset
110 Administration Bldg.
P.O. Box 3000
Somerville, NJ 08876

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