

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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IN THE MATTER OF NEIGHBORS UNITED
BELOW CANAL, JAN LEE, DCTV, EDWARD J.
CUCCIA, BETTY LEE, and AMERICAN INDIAN
COMMUNITY HOUSE,

Index No.

NOTICE OF PETITION

Petitioners,

For a Judgment pursuant to Article 78 of the CPLR

-against-

MAYOR BILL DEBLASIO, THE CITY OF NEW
YORK, NEW YORK CITY PLANNING
COMMISSION, MARISSA LAGO,
NEW YORK CITY DEPARTMENT OF CITY
PLANNING, NEW YORK CITY DEPARTMENT OF
CORRECTION, CYNTHIA BRANN, NEW YORK
CITY MAYOR'S OFFICE OF CRIMINAL JUSTICE,
ELIZABETH GLAZER, NEW YORK CITY
DEPARTMENT OF CITYWIDE ADMINISTRATIVE
SERVICES, LISETTE CAMILO, and NEW YORK
CITY COUNCIL,

Respondents.

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TO THE ABOVE-NAMED RESPONDENTS:


PLEASE TAKE NOTICE that, upon the annexed Verified Petition, dated February 13, 2020, the accompanying affidavits of Dr. Judith Zelikoff, PhD, sworn to February 7, 2020, George Janes, AIPC, sworn to February 11, 2020, Kerri Culhane, sworn to February 3, 2020, Jan Lee, sworn to February 12, 2020, Keiko Tsuno, sworn to February 12, 2020, Edward J. Cuccia, sworn to February 4, 2020, Betty Lee, sworn to February 3, 2020, and Iakowi:He'Ne', sworn to February 9, 2020, and the Memorandum of Law in Support of the Verified Petition dated February 13, 2020, Petitioners will make an application to this Court in an IAS Part at the New

York County Supreme Court, 60 Centre Street, on March 13, 2020 at 9:30 a.m., or as soon thereafter as counsel may be heard, for a judgment pursuant to Article 78 of the New York Civil Practice Law and Rules as follows: annulling, vacating, and reversing the determinations of the Respondents approving a new jail facility on 124-125 White Street in Manhattan as part of the New York Borough Based Jail System; and granting such other and further relief as the Court deems proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to CPLR § 7804(c), an answer and any supporting papers must be upon the undersigned at least five (5) days before the return date set forth above.

Dated: New York, New York
February 13, 2020

MINTZER MAUCH PLLC

By: 

Karen L. Mintzer
Helen C. Mauch

Attorneys for Petitioners