

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

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COUNCILMEMBER CHRISTOPHER MARTE,
CARLOS E. TORRES, MARIA SALAS, SHIELA
HARTE, SOOK YIN YANG, YUET SIU LEE, WENDY
PEREZ, MARGARET MOY, BRENDA MALOY,
BARBARA KEMPE, AIDA RUIZ and DANETTE
CHAVIS,

Index No.: 159068/2022

NOTICE OF APPEAL

Plaintiffs,

-against-


THE CITY OF NEW YORK, CHERRY STREET
OWNER LLC, TWO BRIDGES SENIOR
APARTMENTS, L.P., TWO BRIDGES ASSOCIATES,
L.P. and LE1 SUB LLC,

Defendants.

----- X

PLEASE TAKE NOTICE that annexed hereto is a true and accurate copy of a
Decision/Order by the Honorable Arlene P. Bluth, dated April 17, 2023, entered with the
Clerk of the County of New York against Plaintiffs on April 24, 2023. Plaintiffs hereby
appeal the entire Decision to the Appellate Division, First Department.

Dated: East Hampton, New York
April 24, 2023



JACK L. LESTER, ESQ.
Attorney for Plaintiffs
41 Squaw Road
East Hampton, NY 11937
631-604-2228

To: All Parties (E-File)

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

----- X

COUNCILMEMBER CHRISTOPHER MARTE,
CARLOS E. TORRES, MARIA SALAS, SHIELA
HARTE, SOOK YIN YANG, YUET SIU LEE, WENDY
PEREZ, MARGARET MOY, BRENDA MALOY,
BARBARA KEMPE, AIDA RUIZ and DANETTE
CHAVIS,

Index No.: 159068/2022

NOTICE OF ENTRY

Plaintiffs,

-against-

THE CITY OF NEW YORK, CHERRY STREET
OWNER LLC, TWO BRIDGES SENIOR
APARTMENTS, L.P., TWO BRIDGES ASSOCIATES,
L.P. and LE1 SUB LLC,

Defendants.

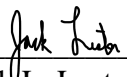
----- X

SIRS:

PLEASE TAKE NOTICE that the within is a true copy of the Decision/Order of the
Honorable Arlene P. Bluth, dated April 17, 2023, duly entered with the Clerk of the within
named Court on April 17, 2023.

Dated: East Hampton, New York
April 24, 2023

The Law Office of Jack L. Lester, Esq.



Jack L. Lester, Esq.
41 Squaw Road
East Hampton, NY 11937
631-604-2228

To: All parties (*e-file*)

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

PRESENT: HON. ARLENE P. BLUTH PART 14

Justice

-----X

COUNCILMEMBER CHRISTOPHER MARTE, MARIA SALAS, SHEILA HART, FU MAN CHANG, YUET SIU LEE, WENDALINE PEREZ, MARGARET MOY, BARBARA JETER, PEARL RUSSELL, BARBARA KEMPE, AIDA RUIZ

INDEX NO. 159068/2022
MOTION DATE 03/28/2023
MOTION SEQ. NO. 001 002 003

Plaintiffs,

- v -

THE CITY OF NEW YORK, CHERRY STREET OWNER LLC, TWO BRIDGES SENIOR APARTMENTS, L.P., TWO BRIDGES ASSOCIATES, L.P., 265 CHERRY STREET OWNER LLC, LE1 SUB LLC,

DECISION + ORDER ON MOTION

Defendants.

-----X

The following e-filed documents, listed by NYSCEF document number (Motion 001) 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 84, 85, 86, 87, 88, 89, 91, 92

were read on this motion to/for DISMISS.

The following e-filed documents, listed by NYSCEF document number (Motion 002) 32, 33, 34, 96

were read on this motion to/for DISMISS.

The following e-filed documents, listed by NYSCEF document number (Motion 003) 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 93, 94, 95

were read on this motion to/for DISMISS.

Motion Sequence Numbers 001, 002 and 003 are consolidated for disposition. Defendant the City of New York’s motion (MS001) to dismiss is granted. Defendant Cherry Street Owner LLC’s motion (MS002) to dismiss is granted. Defendants 265 Cherry Street Owner LLC, LE1 Sub LLC and Two Bridges Senior Apartments, L.P. (collectively, “LE1”)’s motion (MS003) to dismiss is granted.

Background

This declaratory judgment action seeks an order compelling defendants to take various actions in connection with a housing development project in the Two Bridges neighborhood in Manhattan. Plaintiffs contend they live in the neighborhood and insist that the development, which encompasses three different sites, impinges on their constitutional and environmental rights. They point to Article 1, Section 19 of the New York State Constitution, which provides that “Each person shall have a right to clean air and water, and a healthful environment” (the “Green Amendment”).

Plaintiffs argue that this project will negatively affect air quality, the amount of open space and result in the loss of light. They demand that vibration and crack monitors be installed to prevent damage to the buildings in which they reside. Plaintiffs complain that available parking will be diminished, which will lead to reduced air quality. They raise numerous issues with the Final Environmental Impact Statement (the “FEIS”) produced for this project, including that it was completed too long ago (in November 2018) to account for the effects of COVID-19. Plaintiffs insist that the FEIS is unconstitutional and violates the constitutional amendment cited above. Plaintiffs observe that the project will include the addition of over 2,700 units.

All defendants move to dismiss. In motion sequence 001, defendant the City of New York (the “City”) moves to dismiss on the ground that the claims are time-barred and fail to state a cause of action. The City points out that there already was an environmental review completed under the State Environmental Quality Review Act (“SEQRA”) over four years ago. It claims the project will provide badly needed housing, including 700 permanently affordable housing units.

The City emphasizes that two previous challenges to this development were unsuccessful and plaintiffs cannot seek another change to discredit the FEIS in this case. It argues that plaintiffs provide nothing new or changed about the project itself that would compel the City to reopen a review under SEQRA or CEQR. The City argues that the Green Amendment was not intended to replace New York's expansive environmental regulatory regime. It also insists that the Green Amendment cannot be applied retroactively.

Defendant Cherry Street Owner, LLC ("Cherry Street") reiterates many of the points raised by the City. It also observes that it, along with the other developers, have invested millions of dollars in reliance upon the First Department decision upholding the City Planning Commission's approvals as valid. Cherry Street questions the effect of plaintiffs' theory, which would purportedly call into question every approval that went through SEQRA review.

LE1 also makes a motion to dismiss that highlights many of the points argued by its fellow co-defendants. It claims that an Article 78 proceeding is required to seek the instant relief, the Green Amendment is not retroactive, that even if this were an Article 78 proceeding it would be untimely and that there are no changes to proposed developments that would require a reexamination of the environmental reports.

Plaintiffs' opposition claims that defendants are breaching the Green Amendment by failing to adhere to SEQRA. They insist that the respiratory health impacts that the development will exacerbate, especially in light of the pandemic, will only increase death rates in the community. Plaintiffs point to an affidavit from Dr. Wu, who insists that air pollution increases in the Two Bridges neighborhood will cause more deaths due to COVID-19 (NYSCEF Doc. No. 86).

Plaintiffs argue that there are changed environmental circumstances that occurred after the publication of the original Environmental Impact Statement (“EIS”) that compels the City to do a Supplemental Environmental Impact Statement (“SEIS”). They characterize the pandemic as a newly discovered health hazard that must be taken into consideration. Plaintiffs argue that the Green Amendment is self-executing, meaning it does not need any other legislation to be enforced. They maintain that the City does not have the discretion to ignore the state constitution, and the fact that the Green Amendment does not contain any mandatory duties is of no moment. Plaintiffs argue that a declaration is most appropriate where a constitutional question is involved.

Discussion

The instant decision requires this Court to assess the impact of the recently passed Green Amendment and how it interacts with the parties’ affirmative rights. The impact of passing this amendment and its influence on environmental jurisprudence in this state is only in its infancy. It has been discussed in at least one case in which residents of Perinton, New York sought relief based on the Green Amendment to modify the operation of a landfill (*Fresh Air for the Eastside, Inc. v State*, 2022 N.Y. Slip Op. 34429[U], 3 [Sup Ct, Monroe County 2022]).¹ However, as will be discussed in greater detail below, that case is distinctly different from this one.

New York ratified the Green Amendment in November 2021, and added it to the New York Bill of Rights. It became effective on January 1, 2022 (*id.* at 2). Various court opinions across the country in states that have adopted these types of amendments suggest: “1) that constitutional environmental rights have been interpreted primarily as procedural, not

¹ The Court observes that it was also discussed briefly in a companion case, *Fresh Air for the Eastside, Inc. v Town of Perinton et al.*, Index No. E2021008617 (Sup Ct, Monroe County 2022), in which petitioners brought an Article 78 petition against The town of Perinton to annul the approval of the application for the landfill.

substantive, rights, and (2) that courts ignore the substantive rights language in the constitutional text in favor of other language, which is then given its content through other legal doctrines” (Amber Polk, *The Unfulfilled Promise of Environmental Constitutionalism*, 74 Hastings LJ 123, 165 [2022]).

Moreover, many states, such as Pennsylvania and Hawaii, have found that this type of provision is self-executing (*id.* n 49). “The doctrine of self-execution has to do with the question of whether the constitutional language provides a complete and enforceable rule that a court could implement without the aid of legislative enactment” (*id.*). Certainly, the broad language used in New York’s Green Amendment poses thorny questions about how it impacts a plaintiff’s right to seek relief in reliance upon this provision. A key purpose for the passage of this type of amendment is to address the issue of standing (*id.* n 58), an obstacle that often arises when parties attempt to bring environmental cases.

Including in New York’s Bill of Rights an affirmative right to clean air, water and a healthful environment will undoubtedly make it easier for parties to seek relief where, potentially, they may not have been able to previously make such application (*Fresh Air*, 2022 WL 18141022, n 6 [discussing the difficulties facing a plaintiff who wanted to seek relief related to the landfill]). And it will undoubtedly change the standard by which such claims are analyzed. A Court must consider whether a challenged agency action brought in an Article 78 proceeding is arbitrary or capricious. That may not be the standard to evaluate a possible violation of a constitutional right under the Green Amendment (*id.*). And, presumably, the Green Amendment—to the extent it is interpreted to confer substantive rights as opposed to solely procedural rights—may aid environmental plaintiffs who seek to pursue causes of action that are notoriously difficult to prove (such as a private nuisance).

This case, however, poses a different question. The context in which this case arises involves numerous other attempts to stop the instant development. Those efforts were ultimately rejected in February 2021, when the Appellate Division, First Department upheld the New York City Planning Commission’s decision to approve the building applications (*Tenants United Fighting for Lower E. Side v City of New York Dept. of City Planning*, 191 AD3d 548 [1st Dept 2021], *lv to appeal denied*, 37 NY3d 902 [2021], and *lv to appeal denied sub nom. Lower E. Side Organized Neighbors v New York City Planning Commn.*, 37 NY3d 902 [2021]). Plaintiffs here do not seek relief under the Green Amendment as part of the initial effort to challenge a development. Instead, they seek yet another “bite at the apple” under circumstances where every previous request has proved unsuccessful and where, on this record, nothing substantive has changed in the intervening years. For that reason, the Court grants the motions to dismiss.

The Court hesitates to create a brand-new route to challenge developments on an environmental basis, which is exactly what plaintiffs’ action would entail. SEQRA and CEQR provide substantial environmental protections and require state and city agencies to consider all manner of factors before approving certain projects. A Court is not the right forum to, essentially, modify the state’s environmental regulatory scheme regarding consideration of proposals for developments—that is the province of the legislature. Unlike the situations suggested above (such as addressing the effects of a landfill), litigants have little problem acquiring standing to challenge, and sometimes stop, proposed development projects while relying on SEQRA and CEQR as well as numerous other regulations.

How the Green Amendment will be interpreted over time is unclear. But this Court declines to find that it somehow creates a way to, essentially, make a motion to renew or to start raising challenges that should have been raised long ago. It does not augment an existing statute

of limitations or start a new limitations period. The Court also finds that although this matter is styled as a plenary action, it is, in fact, an Article 78 proceeding to challenge the City's decision to approve this development and so for that reason it is time-barred. The limitations period of four months applicable to these claims has long expired (*see Matter of Save Pine Bush, Inc. v City of Albany*, 70 NY2d 193, 203, 518 NYS2d 943 [1987]).

Moreover, the substantive claims in the complaint do not compel the Court to deny the instant motions. Unlike in *Fresh Air for the Eastside, Inc. v State*, 2022 N.Y. Slip Op. 34429[U], 3 [Sup Ct, Monroe County 2022]), this is not a situation involving odors from an existing landfill. In that situation, the impact on the residents is readily apparent and the application of the Green Amendment is obvious. This litigation involves building new residential units and requires a balancing of many factors—that is partially why there are statutes such as SEQRA, CEQR and other development-focused procedures. City and state agencies considering a zoning change must balance environmental impacts with the benefits of that development; here, that includes increased housing. The project at issue will create about 700 permanently affordable units in addition to thousands of other units.

Plaintiffs' purported environmental harms are, for the most part, the types of harms traditionally raised by those who oppose construction projects. Many are well founded; there is no doubt that living next to a construction site is, at best, annoying and, at worst, a major inconvenience that disrupts neighbors' lives. Construction can be loud and seemingly endless, and it can severely diminish the neighbors' quality of life. But those valid arguments do not create a substantive basis for this action or require the City to revisit the completed environmental reviews for this project. The construction of these buildings does not evince the

same sort of environmental concerns that might accompany, for example, a landfill or toxic waste site.

A review of the complaint makes this point clear: it contains varying alleged harms, some of which are simply part of living in Manhattan. Plaintiffs complain about a lack of parking (which may actually encourage the use of public transportation although plaintiffs apparently claim it will lead to increased driving, possibly while looking for a spot) before complaining about increased carbon dioxide emissions (NYSCEF Doc. No. 2, ¶¶ 20, 21). The Court makes no finding that concerns about air quality are unfounded. It simply finds that such a concern was addressed in the environmental analysis (*see e.g.*, NYSCEF Doc. No. 15 at S-29-30) and there is no basis to revisit it here.

Plaintiffs also attempt to relate their concerns to the COVID-19 pandemic as a way to justify reopening the Final Environmental Impact Statement (“FEIS”). The Court finds that these concerns are too disparate and remote to justify the relief sought in this action. The pandemic, which caused (and will continue to cause) many harmful effects on the health of Manhattan residents, is not a catch-all reason to open up an environmental review. While COVID-19’s impact is a rapidly developing area of public health study, the Court declines to hold that it serves as the basis to reopen an environmental review. To do so would assuredly require agencies to complete another environmental review for nearly every single development project.

Plaintiffs’ specific demands, for crack and vibration monitors, are understandable but not supported by the Green Amendment. Those are specific demands that could be made as part of a future lawsuit if the ongoing construction justifies such intervention. Plaintiffs do not allege that the construction, to the extent it is underway, rises to the level that various Building Code provisions (of which there are many) are being violated. Put another way, plaintiffs might have a

right to seek relief under the Green Amendment if the construction violates other laws regarding noise and vibration levels. The problem for this Court is that the demands here are based upon what plaintiffs contend is going to happen—a prediction is not a basis to sustain a cause of action.

The Court also declines to find that the Green Amendment has retroactive effect, at least in a situation where, as here, there have been multiple unsuccessful challenges exploring the same exact issues. Moreover, defendants here have established that there have not been significant changes to the development that might require a second look. As Cherry Street points out, if the Green Amendment could be used to create a way to reopen previously unsuccessful efforts, then countless projects would be ripe for challenge. Therefore, the Court declines to find, as plaintiffs demand, that the FEIS produced here is unconstitutional.

Summary

The Court's decision in this case is limited. It merely finds that the Green Amendment cannot be used to bring challenges that were already unsuccessful and where the challenge is time-barred. The instant opinion does not stand for the proposition that the Green Amendment is merely a statement of principles. The Supreme Court, in *Fresh Air for the Eastside, Inc.*, found a cognizable cause of action under the Green Amendment at least as against a governmental entity. But that case did not involve an effort to seek relief that had previously been tried time and again and where a significant development project is underway. There must be some finality and the challenges to this project were rejected by the Appellate Division, First Department and by the Court of Appeals. The substantive rights conferred by the Green Amendment surely do not create a right to recast previously rejected efforts to stop a development.

Accordingly, it is hereby

ORDERED that defendants' motions (MS001, 002 and 003) to dismiss to complaint are granted, this case is dismissed and the Clerk is directed to enter judgment in favor of defendants and against plaintiffs without costs or disbursements upon presentation of proper papers therefor.

4/17/2023

DATE



ARLENE P. BLUTH, J.S.C.

CHECK ONE:

CASE DISPOSED

NON-FINAL DISPOSITION

GRANTED

DENIED

GRANTED IN PART

OTHER

APPLICATION:

SETTLE ORDER

SUBMIT ORDER

CHECK IF APPROPRIATE:

INCLUDES TRANSFER/REASSIGN

FIDUCIARY APPOINTMENT

REFERENCE

Supreme Court of the State of New York

Appellate Division: First Judicial Department

Informational Statement (Pursuant to 22 NYCRR 1250.3 [a]) - Civil

Case Title: Set forth the title of the case as it appears on the summons, notice of petition or order to show cause by which the matter was or is to be commenced, or as amended.

COUNCILMEMBER CHRISTOPHER MARTE, CARLOS E. TORRES, MARIA SALAS, SHIELA HARTE, SOOK YIN YANG, YUET SIU LEE, WENDY PEREZ, MARGARET MOY, BRENDA MALOY, BARBARA KEMPE, AIDA RUIZ and DANETTE CHAVIS

- against -

THE CITY OF NEW YORK, CHERRY STREET OWNER LLC, TWO BRIDGES SENIOR APARTMENTS, L.P., TWO BRIDGES ASSOCIATES, L.P. and LE1 SUB LLC

For Court of Original Instance
Date Notice of Appeal Filed

For Appellate Division

Case Type	Filing Type
<input checked="" type="checkbox"/> Civil Action <input type="checkbox"/> CPLR article 75 Arbitration <input type="checkbox"/> CPLR article 78 Proceeding <input type="checkbox"/> Special Proceeding Other <input type="checkbox"/> Habeas Corpus Proceeding	<input checked="" type="checkbox"/> Appeal <input type="checkbox"/> Original Proceedings <input type="checkbox"/> CPLR Article 78 <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Labor Law 220 or 220-b <input type="checkbox"/> Public Officers Law § 36 <input type="checkbox"/> Real Property Tax Law § 1278 <input type="checkbox"/> Transferred Proceeding <input type="checkbox"/> CPLR Article 78 <input type="checkbox"/> Executive Law § 298 <input type="checkbox"/> CPLR 5704 Review

Nature of Suit: Check up to three of the following categories which best reflect the nature of the case.

<input type="checkbox"/> Administrative Review	<input type="checkbox"/> Business Relationships	<input type="checkbox"/> Commercial	<input type="checkbox"/> Contracts
<input checked="" type="checkbox"/> Declaratory Judgment	<input type="checkbox"/> Domestic Relations	<input type="checkbox"/> Election Law	<input type="checkbox"/> Estate Matters
<input type="checkbox"/> Family Court	<input type="checkbox"/> Mortgage Foreclosure	<input type="checkbox"/> Miscellaneous	<input type="checkbox"/> Prisoner Discipline & Parole
<input type="checkbox"/> Real Property (other than foreclosure)	<input type="checkbox"/> Statutory	<input type="checkbox"/> Taxation	<input type="checkbox"/> Torts

Appeal	
Paper Appealed From (Check one only):	If an appeal has been taken from more than one order or judgment by the filing of this notice of appeal, please indicate the below information for each such order or judgment appealed from on a separate sheet of paper.
<input type="checkbox"/> Amended Decree <input type="checkbox"/> Amended Judgement <input type="checkbox"/> Amended Order <input checked="" type="checkbox"/> Decision <input type="checkbox"/> Decree	<input type="checkbox"/> Determination <input type="checkbox"/> Finding <input type="checkbox"/> Interlocutory Decree <input type="checkbox"/> Interlocutory Judgment <input type="checkbox"/> Judgment
<input checked="" type="checkbox"/> Order <input type="checkbox"/> Order & Judgment <input type="checkbox"/> Partial Decree <input type="checkbox"/> Resettled Decree <input type="checkbox"/> Resettled Judgment	<input type="checkbox"/> Resettled Order <input type="checkbox"/> Ruling <input type="checkbox"/> Other (specify):
Court: Supreme Court	County: New York
Dated: 04/17/2023	Entered: 04/24/2023
Judge (name in full): Arlene P. Bluth	Index No.: 159068/2022
Stage: <input type="checkbox"/> Interlocutory <input checked="" type="checkbox"/> Final <input type="checkbox"/> Post-Final	Trial: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes: <input type="checkbox"/> Jury <input type="checkbox"/> Non-Jury
Prior Unperfected Appeal and Related Case Information	
Are any appeals arising in the same action or proceeding currently pending in the court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If Yes, please set forth the Appellate Division Case Number assigned to each such appeal.	
Where appropriate, indicate whether there is any related action or proceeding now in any court of this or any other jurisdiction, and if so, the status of the case:	
Original Proceeding	
Commenced by: <input type="checkbox"/> Order to Show Cause <input type="checkbox"/> Notice of Petition <input type="checkbox"/> Writ of Habeas Corpus	Date Filed: 10/21/2022
Statute authorizing commencement of proceeding in the Appellate Division:	
Proceeding Transferred Pursuant to CPLR 7804(g)	
Court: Choose Court	County: Choose County
Judge (name in full):	Order of Transfer Date:
CPLR 5704 Review of Ex Parte Order:	
Court: Choose Court	County: Choose County
Judge (name in full):	Dated:
Description of Appeal, Proceeding or Application and Statement of Issues	
<p>Description: If an appeal, briefly describe the paper appealed from. If the appeal is from an order, specify the relief requested and whether the motion was granted or denied. If an original proceeding commenced in this court or transferred pursuant to CPLR 7804(g), briefly describe the object of proceeding. If an application under CPLR 5704, briefly describe the nature of the ex parte order to be reviewed.</p> <p>This is an appeal from a Decision/Order granting Defendant's motion to dismiss Plaintiffs' constitutional claim based upon Article 1, Section 19 of the New York State Consitution. The object of this Appeal is to seek a reversal of the lower Court decision.</p>	

Informational Statement - Civil

Issues: Specify the issues proposed to be raised on the appeal, proceeding, or application for CPLR 5704 review, the grounds for reversal, or modification to be advanced and the specific relief sought on appeal.

The issues raised on the Appeal are two-fold. First, the Court's misinterpretation of the applicability of Article 1, Section 19 to the Two Bridges large scale residential development project. Secondly, the failure of the Court to properly apply the standards of a motion to dismiss pursuant to CPLR 3211.

Party Information

Instructions: Fill in the name of each party to the action or proceeding, one name per line. If this form is to be filed for an appeal, indicate the status of the party in the court of original instance and his, her, or its status in this court, if any. If this form is to be filed for a proceeding commenced in this court, fill in only the party's name and his, her, or its status in this court.

No.	Party Name	Original Status	Appellate Division Status
1	COUNCILMEMBER CHRISTOPHER MARTE	Plaintiff	Appellant
2	CARLOS E. TORRES	Plaintiff	Appellant
3	MARIA SALAS	Plaintiff	Appellant
4	SHIELA HARTE	Plaintiff	Appellant
5	SOOK YIN YANG	Plaintiff	Appellant
6	YUET SIU LEE	Plaintiff	Appellant
7	WENDY PEREZ	Plaintiff	Appellant
8	BRENDA MALOY	Plaintiff	Appellant
9	BARBARA KEMPE	Plaintiff	Appellant
10	AIDA RUIZ	Plaintiff	Appellant
11	DANETTE CHAVIS	Plaintiff	Appellant
12	THE CITY OF NEW YORK	Defendant	Defendant
13	CHERRY STREET OWNER LLC	Defendant	Defendant
14	TWO BRIDGES SENIOR APARTMENTS, L.P.	Defendant	Defendant
15	TWO BRIDGES ASSOCIATES, L.P.	Defendant	Defendant
16	LE1 SUB LLC	Defendant	Defendant
17			
18			
19			
20			

Informational Statement - Civil

Attorney Information

Instructions: Fill in the names of the attorneys or firms for the respective parties. If this form is to be filed with the notice of petition or order to show cause by which a special proceeding is to be commenced in the Appellate Division, only the name of the attorney for the petitioner need be provided. In the event that a litigant represents herself or himself, the box marked "Pro Se" must be checked and the appropriate information for that litigant must be supplied in the spaces provided.

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Party or Parties Represented (set forth party number(s) from table above): 13-16

Attorney/Firm Name:

Address:

City: State: Zip: Telephone No:

E-mail Address: 7288

Attorney Type: Retained Assigned Government Pro Se Pro Hac Vice

Party or Parties Represented (set forth party number(s) from table above):

Attorney/Firm Name:

Address:

City: State: Zip: Telephone No:

E-mail Address:

Attorney Type: Retained Assigned Government Pro Se Pro Hac Vice

Party or Parties Represented (set forth party number(s) from table above):

Attorney/Firm Name:

Address:

City: State: Zip: Telephone No:

E-mail Address:

Attorney Type: Retained Assigned Government Pro Se Pro Hac Vice

Party or Parties Represented (set forth party number(s) from table above):