



**Department of
Environmental
Protection**

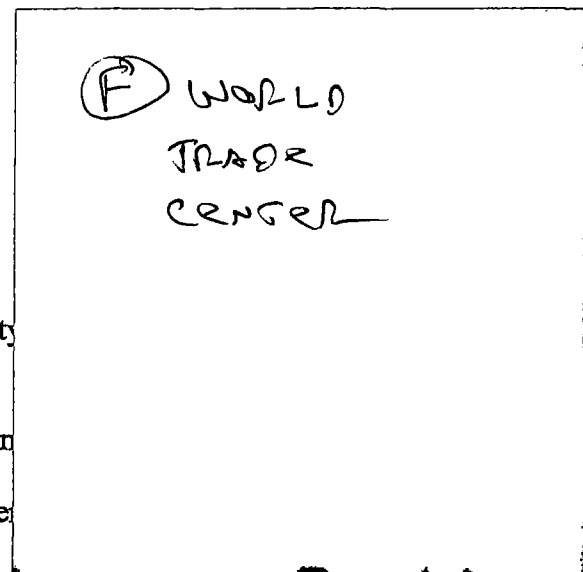
59-17 Junction Boulevard
Flushing, New York
11373-5108

**Christopher O. Ward
Commissioner**

**Mark D. Hoffer
General Counsel**

**Bureau of Legal
Affairs**

Tel (718) 595-6555
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www.ci.nyc.ny.us/dep



TO: Robert Avaltroni, Jr., Deputy
AN&HN 11 Tower

FROM: Jon Deutsch, Assistant Counsel

RE: World Trade Center Recovery

DATE: June 6, 2002

Mark Hoffer received a telephone call from Assistant Corporation Counsel Theresa Barillas [telephone number (212) 788-0515] regarding litigation resulting from the World Trade Center response and recovery efforts.

ACC Barillas needs to meet with you to begin ascertaining the facts surrounding the response and recovery efforts. Please contact her to schedule an appointment. Theresa is the City's lawyer in this instance, and the interview will neither be adversarial nor a deposition; it is merely information gathering.

In addition, please provide me with the names and telephone numbers of all supervisors within your Bureau who had a material role in the response and recovery efforts. Ultimately, these supervisors will meet with ACC Barillas under the same, non-adversarial, circumstances as yourself.

I may be contacted at (718) 5-5-5650 with any questions.

c: Mark Hoffer, General Counsel
Frank Schiano, Assistant Counsel



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(718) DEP-HELP



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FRANK:

1. Theresa Barillas (Torts) called. Law is preparing the City's defense in the many lawsuits already brought against the City stemming from 9/11. It will be handled by their special litigation unit.

They are informally interviewing agency staff who were involved in 9/11 and post-9/11 recovery efforts and have asked to have the following people from DEP come down

Bob Avaltroni

Rachel Stein

Alexandra Samoyitch

I bet they are referring to
Alessandra Samonowicz (MOER) — ~~TC~~ TC 6/6/02

The Directory doesn't list the last 2, but I'm assuming they work for Bob. Can you have someone call each, and ask them to call Theresa (212-788-0515) to schedule a date and time to go down and be interviewed. This is NOT a deposition; it is simply Law trying to build an information base on the City's response to 9/11.

2. As a second step, I'd also like the assigned lawyer to call Bob Avaltroni and Doug Greeley and get the names of any supervisors for those Bureaus who had a material role either in response on 9/11, or on recovery thereafter (I know Mustafa has been heavily involved for Bob). Once you get those lists, I'd like a call to be made to Theresa to give her the names, and then a call to each of the people, asking them to call Theresa to set up a date and time. Again, assure folks that this is not adversarial and not a deposition; it's information gathering.

Please advise who is handling. Thanks.

MARK HOFFER

6/5/02

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Fawzy