



**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
Fax (718) 595-6543
www.ci.nyc.ny.us/dep

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

FROM: Jon Deutsch, Assistant Counsel *Jon*

RE: World Trade Center Recovery Litigation

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



www.nyc.gov/dep

(718) DEP-HELP