

Varoli, David

From: Adams, Robert
Sent: May 02, 2003 9:06 AM
To: Varoli, David
Subject: RE: WTC - Litigation - 7 WTC - Follow-up

Sensitivity: Confidential

David: I do have some records concerning CON-ED and transformer oil spillage - State DEC made CON-ED do a fair amount of clean-up of oil that spilled around #7 - I may even have a copy of the work plans. As to Ammo near building 7, I do not believe they ever found any in that area. It was largely confined to the vicinity of building 6.

Bob

-----Original Message-----

From: Varoli, David
Sent: May 01, 2003 9:06 AM
To: Papageorge, Anne; Rueda, Louie; Mendes, Luis; Eschenasy, Dan; Adams, Robert; Hooker, Don
Cc: Jay Cohen (E-mail); Jesse Levine (E-mail)
Subject: WTC - Litigation - 7 WTC - Follow-up
Sensitivity: Confidential

CONFIDENTIAL AND PRIVILEGED

PREPARED FOR LITIGATION PURPOSES ONLY

Anne, Louie, Luis and Dan, thank you again for taking the time yesterday to meet with the Law Department and the City's outside counsel. They expressed to me again their appreciation of your time and efforts.

As you know, they are in the early stages of preparing the City's defenses to the two claims filed against the City on behalf of Silverstein (IRI insurance company) and Con Ed (Aegis insurance company) alleging that the City is somehow at fault for Building No. 7. As our team of lawyers get more involved in these matters, they may be calling on each of you again to provide additional support. I am here to assist you if and when they call.

During yesterday's meetings (the first meeting was with Anne, Louie, and Luis; and the second meeting was with Dan) they had asked for a number of documents. Please have your assistants make copies of these documents and forward them to my attention. If possible, I would like to get them all copies by the end of next week.

The following was requested:

- 1) Any notes that you may have on the construction of the new building (I believe Luis stated that he may have some notes based on the meetings he attended. Please, also check with the Special Projects staff who may have went to these meetings);
- 2) Any documents sent to DDC by Swanke or OEM concerning the old OEM (I believe Luis stated that they had sent some of these documents to him or to DDC);
- 3) Any documents that reference or mention tanks in the old or new buildings;
- 4) Any information or analysis that DDC provided to OMB or FEMA on the costs of the new building;
- 5) All planning documents or preliminary schematics of the new building or its space;
- 6) Any field notes or documents about the debris removal project of Bldg. #7 only - DDC's staff personnel field logs, notes or diary entries;
- 7) Any pictures of Bldg. #7 from 9/11/01 until the present (I believe Dan said he had some);
- 8) Any documents that the engineers generated concerning Bldg. # 7 (Dan);

9) Any drawings of the foundation of Bldg. #7 (Dan);

10) FOR BOB ADAMS: Any information about the discovery and/or removal of oil spillage or ammo-related items found at or around Bldg. #7 only (Bob Adams - on vacation - I will follow-up with Bob);

11) FOR DON HOOKER: Any information that the City's Vendex system has on the following contractors who were involved in the old OEM HQ's construction:

Swanke Hayden;
Cantor Seinuk;
Cosentini;
Precision Interiors;
Kayback; and
Ambassador

(I will follow-up with Don for copies of whatever is in Vendex on these firms).

Again, thank you for your assistance. If you have any questions call me. If you do not think you will make next Friday's deadline for giving me copies, please let me know ASAP.

David J. Varoli
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