

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: IAS PART _____

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In the Matter of the Application of

**SURVEILLANCE TECHNOLOGY
OVERSIGHT PROJECT,**

Petitioner,

For a Judgment Pursuant to
Article 78 of the Civil Practice Law and Rules

N.Y. Sup. Ct.
Index No.: 150127 /20

-against-

**AFFIRMATION OF
CHRISTOPHER DYESS
IN SUPPORT OF
PETITIONER'S VERIFIED
PETITION FOR A
JUDGMENT PURSUANT
TO ARTICLE 78 OF THE
CIVIL PRACTICE LAW
AND RULES**

**METROPOLITAN TRANSPORTATION
AUTHORITY, NEW YORK CITY TRANSIT**

Respondent.

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**AFFIRMATION OF CHRISTOPHER DYESS IN SUPPORT OF PETITIONER'S
VERIFIED PETITION FOR A JUDGMENT PURSUANT TO ARTICLE 78 OF THE
CIVIL PRACTICE LAW AND RULES**

Christopher R. Dyess, an attorney duly admitted to practice law before the Courts of the State of New York, hereby affirms the following to be true under penalty of perjury, pursuant to Civil Practice Law and Rules Rule 2106:

1. I am an attorney with the law firm of Weil, Gotshal & Manges LLP, pro bono counsel to Petitioner Surveillance Technology Oversight Project. I submit this

Affirmation in support of Petitioner's Verified Petition for a Judgment Pursuant to Article 78 of the Civil Practice Law and Rules.

2. Attached hereto as **Exhibit A** is a true and correct copy of an April 22, 2019 Freedom of Information Law request submitted to Metropolitan Transit Authority Headquarters ("MTA HQ") and MTA New York City Transit ("NYCT").

3. Attached hereto as **Exhibit B** is a true and correct copy of an April 29, 2019 letter from Richard Harrington to Albert F. Cahn.

4. Attached hereto as **Exhibit C** is a true and correct copy of an April 30, 2019 email from Richard Harrington to Albert F. Cahn acknowledging receipt of the FOIL Request (labeled #24047 in the subject line).

5. Attached hereto as **Exhibit D** is a true and correct copy of a May 1, 2019 email from Ann Cutler to Albert F. Cahn.


6. Attached hereto as **Exhibit E** is a true and correct copy of a June 18, 2019 Administrative appeal from Anthony Zangrillo to MTA HQ & NYCT.

7. Attached hereto as **Exhibit F** is a true and correct copy of a June 26, 2019 email from Ann Cutler to Albert F. Cahn.

8. Attached hereto as **Exhibit G** is a true and correct copy of a June 27, 2019 email from Harris Berenson to Anthony Zangrillo.

9. Attached hereto as **Exhibit H** is a true and correct copy of a November 15, 2019 email from Christopher R. Dyess to Richard Harrington.

Dated: January 3, 2020
New York, New York



Christopher R. Dyess