

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

In the matter of the application of

BROOKLYN HEIGHTS ASSOCIATION,  
INC.,

Petitioner,

-against-

NEW YORK STATE URBAN  
DEVELOPMENT CORPORATION d/b/a  
EMPIRE STATE DEVELOPMENT,  
BROOKLYN BRIDGE PARK  
DEVELOPMENT CORPORATION, and  
BROOKLYN BRIDGE PARK  
CORPORATION d/b/a BROOKLYN BRIDGE  
PARK,

Respondents,

-and-

RAL DEVELOPMENT SERVICES LLC,  
OLIVER'S REAL ESTATE GROUP LLC d/b/a  
OLIVER'S REALTY GROUP,  
LANDING A ASSOCIATES LLC, AND  
LANDING B ASSOCIATES LLC,

Interested Party-Respondents

Index No.: 155641/2016  
(Billings, J.)

**CORRECTED NOTICE OF MOTION  
FOR TEMPORARY RESTRAINING  
ORDER AND/OR PRELIMINARY  
INJUNCTION**

**Oral Argument is Requested**

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law in Support of Motion for Temporary Restraining Order and/or Preliminary Injunction, Affirmation of Matthew J. Wilkins, sworn to on the day of June 30, 2017, Affidavit of Todd Castilow, sworn to on the day of June 23, 2017, the Amended Verified Petition ("Amended Petition") of the Brooklyn Heights Association, Inc. ("Petitioner"), previously submitted by Petitioner in this proceeding, and upon all the prior proceedings and record had herein to date, a motion pursuant to CPLR § 6301 will be made at this Court, located at 71 Thomas Street, Room 204, on July 18, 2017, at

2:30 p.m., or as soon thereafter as counsel can be heard, for an order enjoining and restraining Respondents, Interested Party-Respondents, and all their agents, servants, employees, and all other persons in active concert of participation with them from engaging in any physical alteration, construction, or other work on Parcels A and B at Pier 6 at Brooklyn Bridge Park that constitutes the start of construction or continuation of construction of the residential towers that were authorized by the final action of the Board of Directors of Respondent Brooklyn Bridge Park Corporation on June 7, 2016, with such temporary restraining order and/or preliminary injunction to continue in force until the Court's disposition of the Amended Petition.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR § 2214(b), answering papers, if any, are required to be served upon the undersigned at least seven days (7) before the return date of this motion and reply papers, if any, shall be served one (1) day before the return date of this application.

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Richard F. Ziegler

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*Attorneys for Petitioner  
Brooklyn Heights Association, Inc.*

Dated: June 30, 2017

New York, New York