

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

In the matter of the application of
BROOKLYN HEIGHTS ASSOCIATION,
INC.,

Petitioner,

For a Judgment Pursuant to Article 78 and
3001 of the Civil Practice Law and Rules,

-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

(J. Billings)

**AFFIRMATION OF MATTHEW J.
WILKINS IN SUPPORT OF
PETITIONER'S MOTION FOR
TEMPORARY RESTRAINING
ORDER AND/OR PRELIMINARY
INJUNCTION**

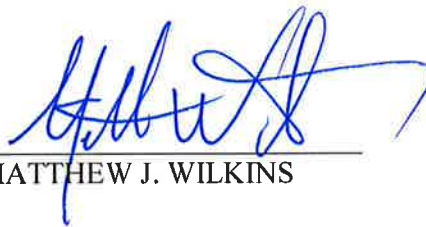
MATTHEW J. WILKINS, an attorney duly admitted to practice law before the Courts
of the State of New York, affirms under penalty of perjury as follows:

1. I am an associate at the law firm of Jenner & Block LLP, attorneys for Petitioner
the Brooklyn Heights Association, Inc. ("BHA") in this proceeding.
2. I have personal knowledge of the facts and circumstances that underlie this
litigation, and I submit this affirmation based on such personal knowledge.

3. I submit this affirmation in support of Petitioner's Motion for Temporary Restraining Order and/or Preliminary Injunction, dated June 30, 2017.

4. Attached hereto as Exhibit A is a true and correct copy of a June 28, 2017 letter from Respondents notifying Petitioner that Landing A Associates LLC and Landing B Associates LLC intend to commence construction of the development at Pier 6 on or after July 19, 2017.

Affirmed at New York, New York on June 30, 2017.



MATTHEW J. WILKINS

Exhibit A



Richard G. Leland
Partner

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VIA EMAIL

June 28, 2017

Richard F. Ziegler, Esq.
Jenner & Block LLP
919 Third Avenue
New York, NY 10022

**Re: Brooklyn Heights Association, Inc. v. New York State Urban
Development Corporation d/b/a Empire State Development Corporation, et al.
Supreme Court, New York County (Index No. 155641/2016)**

Dear Mr. Ziegler:

In accordance with the Scheduling Stipulation dated July 28, 2016 among all parties to this proceeding, Respondents and Interested Party-Respondents give you notice that Landing A Associates LLC and Landing B Associates LLC intend to commence construction of the development at Pier 6 on or after July 19, 2017.

Very truly yours,

A handwritten signature in blue ink, appearing to be "R. Leland", with a long horizontal line extending to the right.

Richard G. Leland

cc: All counsel