

PREMIER INVESTIGATIONS

FOI#15284

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Port Authority of New York & New Jersey
225 Park Avenue South – 17th Floor
New York, NY 10003

September 3rd, 2014

ATTN: Daniel Duffy/FOIL UNIT

Re: Fernandez, Maria v T&T Industry, Inc. & Piccinonno
Date of Loss: 4/28/11
Accident location: Entrance/Roadway to Holland Tunnel (Manhattan side)
Premier File#: D-12823

Mr. Duffy,

I am an investigator working on behalf of the law offices of Edward Garfinkel and
AIG Insurance. This law office, along with AIG represents T&T Industry, Inc. and driver
Michael Piccinonno with regard to the lawsuit outlined above.

F.O.I.L. REQUEST

**Please provide certified documentation for the installation and maintenance of the
"Take turns merging" signs located along the entrance roadway to the Holland Tunnel
(Manhattan side), including but not limited to permits, work orders, inspections, repairs,
date of installation, etc.**

**Attached please find a photograph of the signs in question along with a map showing
the area/accident location (these signs are located North of Watts Street/South of
Broome Street). I have also included a copy of the Port Authority of NY/NJ Police
accident report.**

Please contact me to advise of any additional information or fee required to comply with this
request. I can be reached at (516) 359-6697. Thank you for your help with this matter.

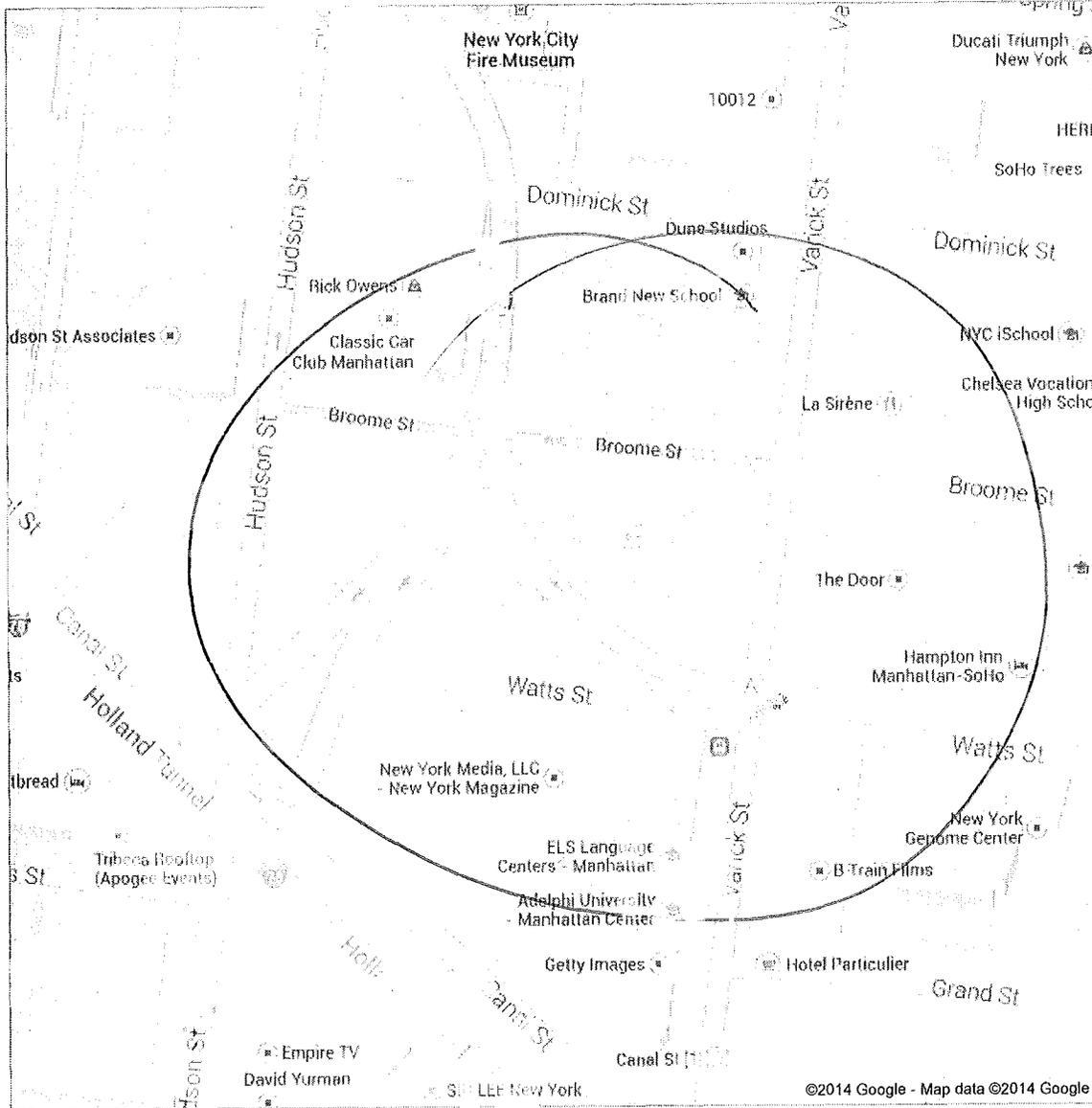
Truly yours,

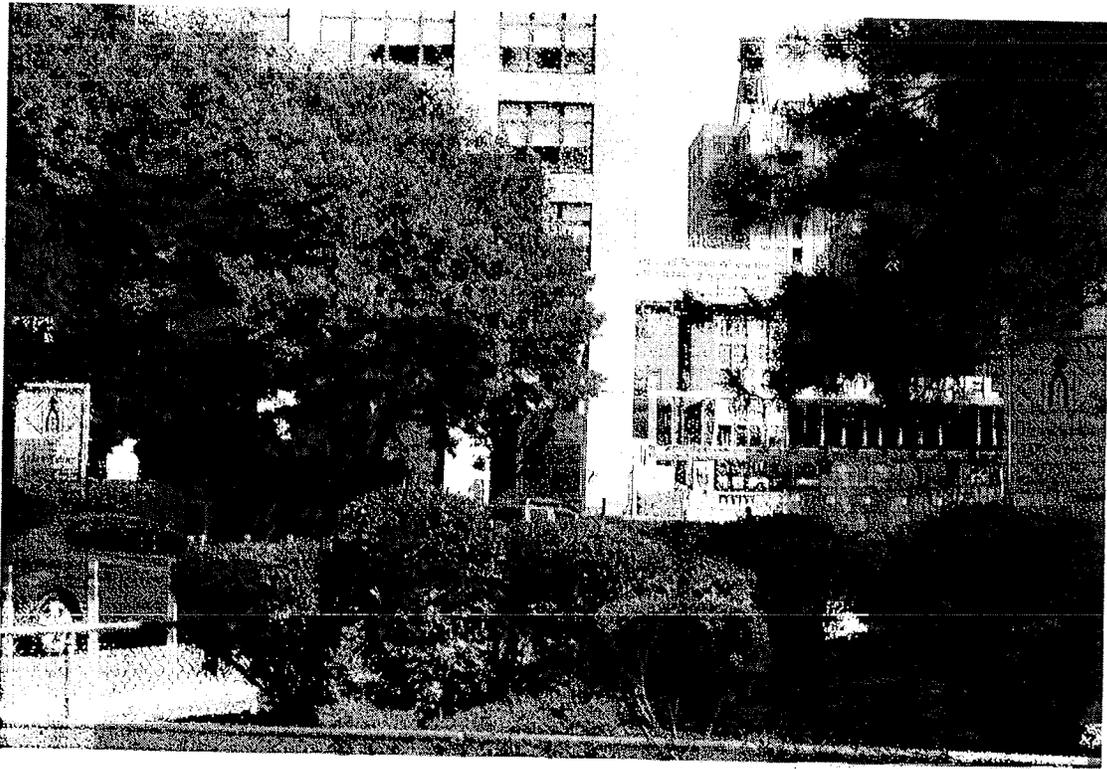

Marlon J. Weingrad
Investigator

09-04-14P02:58 RCVD



Address Varick St & Watts St
Varick St & Watts St
New York, NY 10013





FOI Administrator

September 26, 2014

Mr. Marlon J. Weingrad
Premier Investigations
180 South Broadway
White Plains, NY 10605

Re: Freedom of Information Reference No. 15284

Dear Mr. Weingrad:

This is a response to your September 3, 2014 request, which has been processed under the Port Authority's Freedom of Information Code, (the "Code", copy enclosed), for "Request for copies of certified documentation for the installation and maintenance of the "take turns merging" signs located along the entrance roadway to the Holland Tunnel (Manhattan side), including but not limited to permits, work orders, inspections, repairs, and date of installation."

Enclosed is the available material responsive to your request.

Please refer to the above FOI reference number in any future correspondence relating to your request.

Very truly yours,



Daniel D. Duffy
FOI Administrator

Enclosure

CERTIFICATION

DATE: September 10, 2014

Name: Jose M. Rivera, Jr.
Address: Two Gateway Center, 14th Floor, Newark, NJ 07102
Employee #: 28770
Date: September 10, 2014

RE: ***FOI REQUEST REFERENCE NO. 15284 - MARLON J. WEINGRAD (PREMIER INVESTIGATIONS)***
Request for copies of certified documentation for the installation and maintenance of the "take turns merging" signs located along the entrance roadway to the Holland Tunnel (Manhattan side), including but not limited to permits, work orders, inspections, repairs, and date of installation

To Whom It May Concern:

I am the **Chief Traffic Engineer** at the Port Authority of New York and New Jersey in the Engineering Department. I have searched the files in response to above-referenced matter requesting documents pertaining to the traffic signs in question.

- I certify that the attached are the records in the possession of the Port Authority which are responsive to the above-referenced freedom of information request.
- I certify that we have searched our records and have found no documents available to comply with the request in the above-referenced freedom of information request.
- I certify that the records which would comply with the above-referenced freedom of information request have been destroyed pursuant to the Port Authority's Record Retention Policy.

Jose M. Rivera, Jr., P.E.

Name


Signature

September 10, 2014

Date

Port Authority of NY & NJ

SIGN SERVICE REQUEST

**THIS FORM (PA1821A) IS FOR USE BY TRAFFIC ENGINEERING STAFF ONLY
(FACILITY AND LINE DEPARTMENT STAFF SHOULD USE FORM PA1821 TO REQUEST SIGNS, ETC.)**

SSR NUMBER
2008-0014

FACILITY HT	DATE ORIGINATED 2/14/2008	DATE REC'D BY T.E. 3/26/2008	DATE REQUIRED 5/15/2008	PR, A, B or C C	PRTY. & INIT. (FOR "C" ONLY) PROY - A.L.
TRAFFIC ENGINEER Xiong Wu	TITLE Traffic Engineer		PA TIE LINE & EXT. 04-7860	OUTSIDE TEL. NO. (973) 565-7860	
FACILITY REQUESTOR (IF APPLICABLE) Luis Franco	TITLE Traffic Engineer		PA TIE LINE & EXT. 04-7837	OUTSIDE TEL. NO. (973) 565-7837	
SPECIAL CHARGE CODE (IF APPLICABLE)					

Pursuant to the authority vested in me by the Executive Director by memorandum dated, June 23, 1963, I hereby authorize (this, these) (installations, removals, changes in location, etc.) of (Signs, ~~Signs, Markings, etc.~~) as described below.

Date: 4/18/08 FOR [Signature]
Chief Traffic Engineer

Describe Sign(s) or other Traffic Control Device(s) required. (Show location in sketch, including all pertinent details. If necessary, attach additional sheets.)

HT NY side Approach / signs improvement

Instructions

Location:
NY side approach to HT as shown on sheet 3.

Fabricate:
9 - 30"x30", Sign "A".
9 - 24"x42", Sign "B"
as shown on sheet 2.

Details: Use DG3 Sheeting to fabricate sign
Apply Anti-Graffiti Coating

Remove:
Remove existing signs as shown on sheets 3-5.

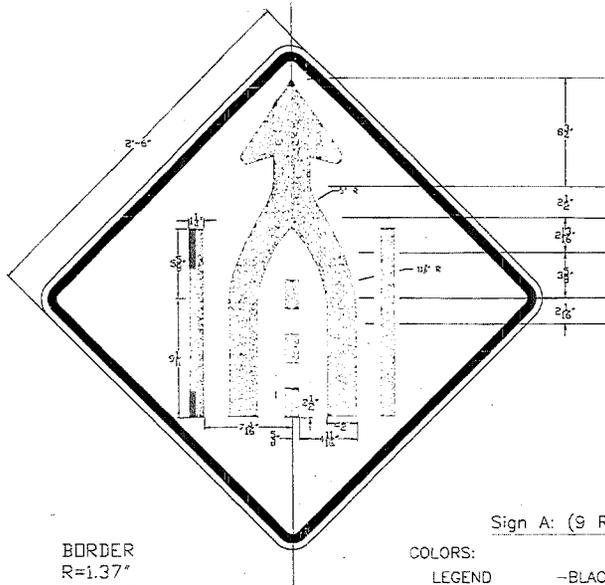
Install:
Install all signs, See Sheets 3 -9

Total:
Fabrication: 120 S.F. (18 Signs)
Installation: 120 S.F. (18 Signs)
Remove: 70 S.F. (10 Signs)

Installed 6/27/08

Tracking #: 07-021a Request #:

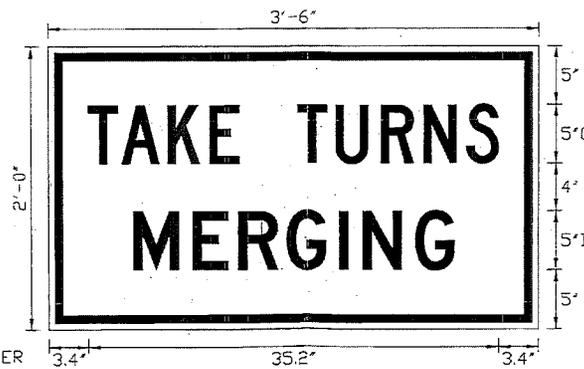
DATE RECEIVED	DATE COMPLETED	CREW LEADER	PRO	UNIT	ACT	JOB NUMBER
____/____/____	____/____/____		B2	420	134 135	700.329 703.329



BORDER
 R=1.37"
 TH=0.75"
 IN=0.5"

Sign A: (9 Req.)

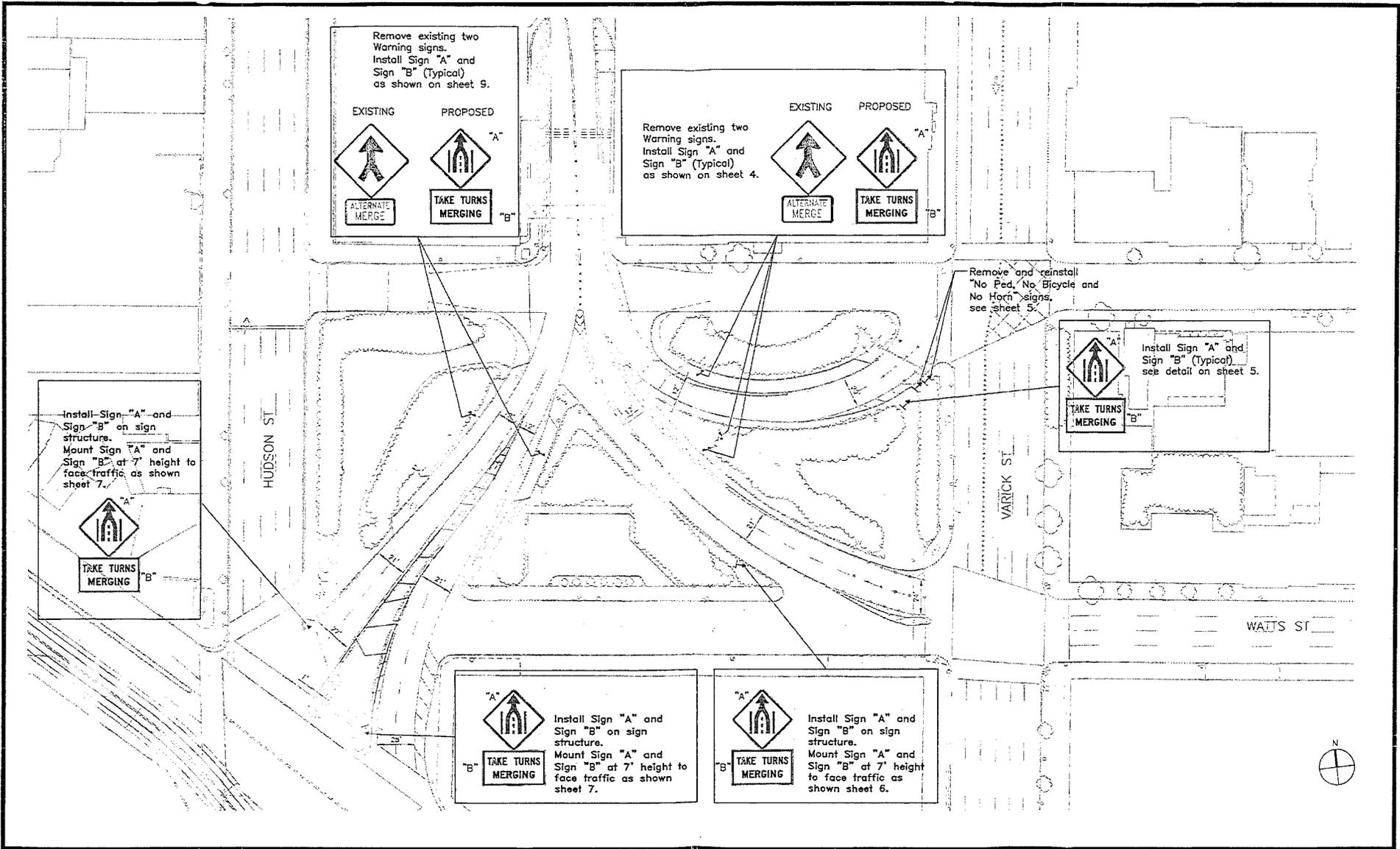
COLORS:
 LEGEND -BLACK
 BACKGROUND -YELLOW (REFLECTIVE)

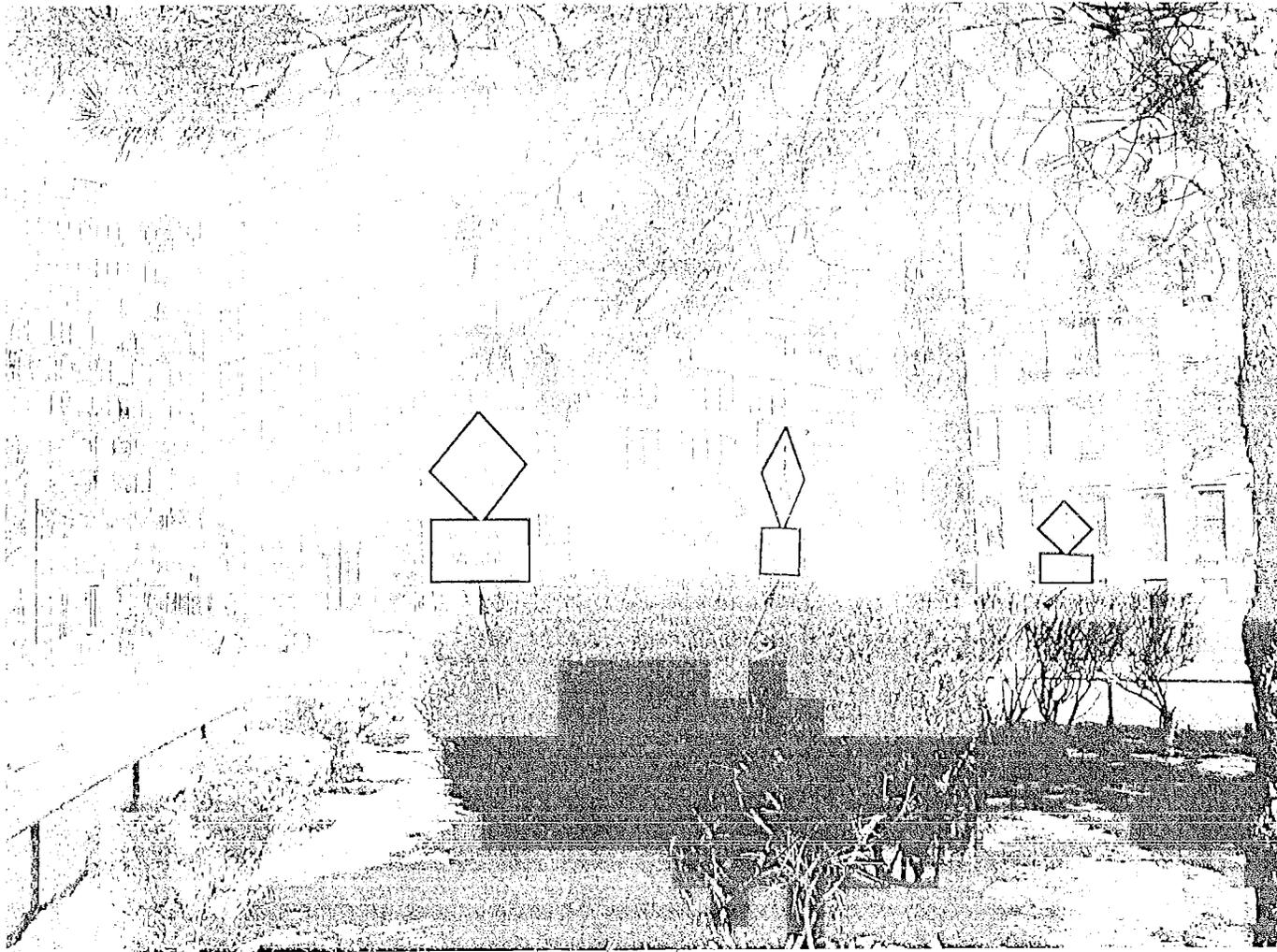


BORDER
 TH=0.75"
 IN=0.5"

Sign B: (9 Req.)

COLORS:
 LEGEND -BLACK
 BACKGROUND -YELLOW (REFLECTIVE)





Remove existing warning signs. Install Sign "A" and Sign "B" at same location (Typical). See sheet 3.

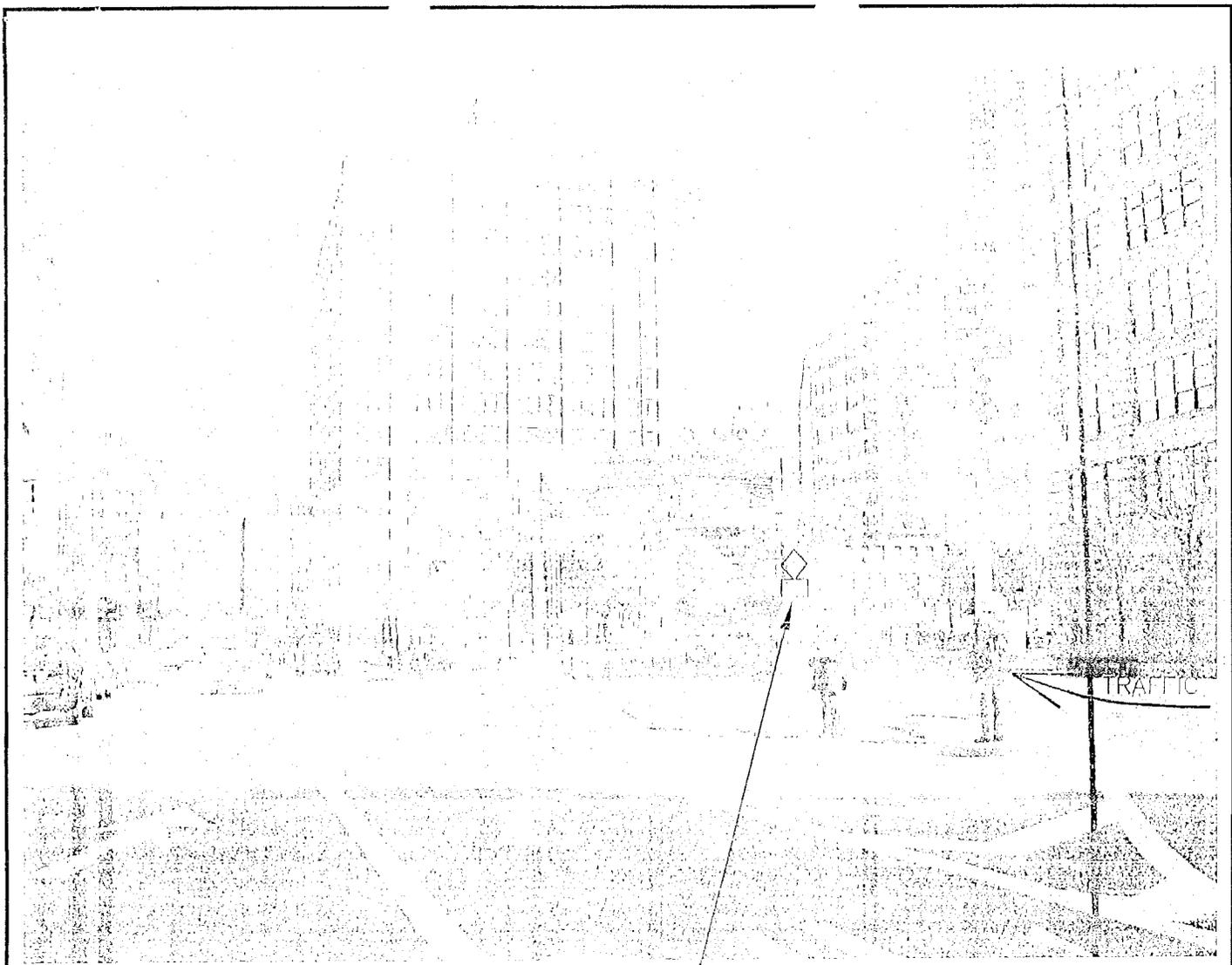


Relocate "No Ped,
No Bicycle and No Horn" signs.
Remove existing post.
See sheet 3.

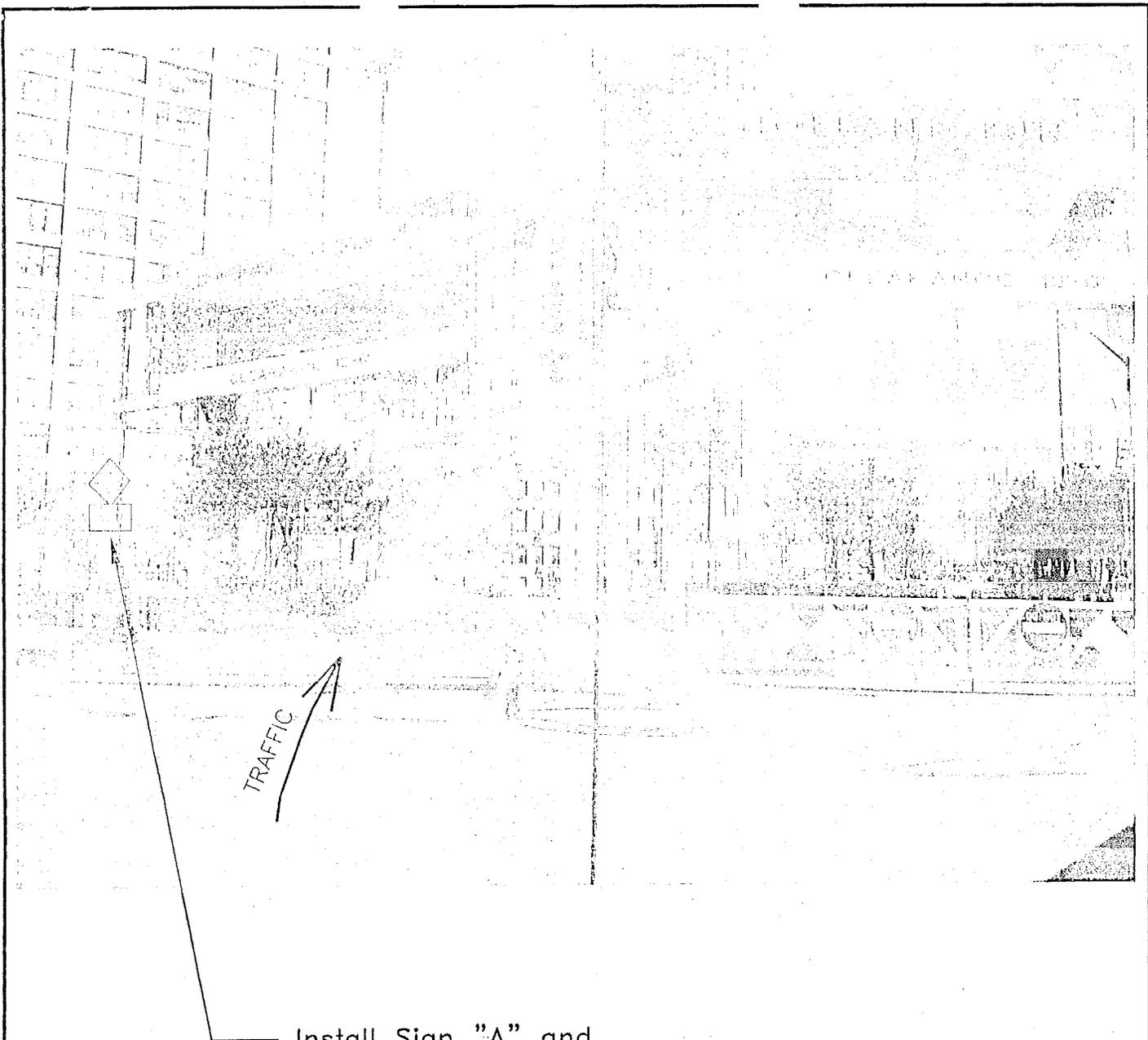
Install Sign "A" and
Sign "B" on new post
and face to traffic.
See sheet 3.



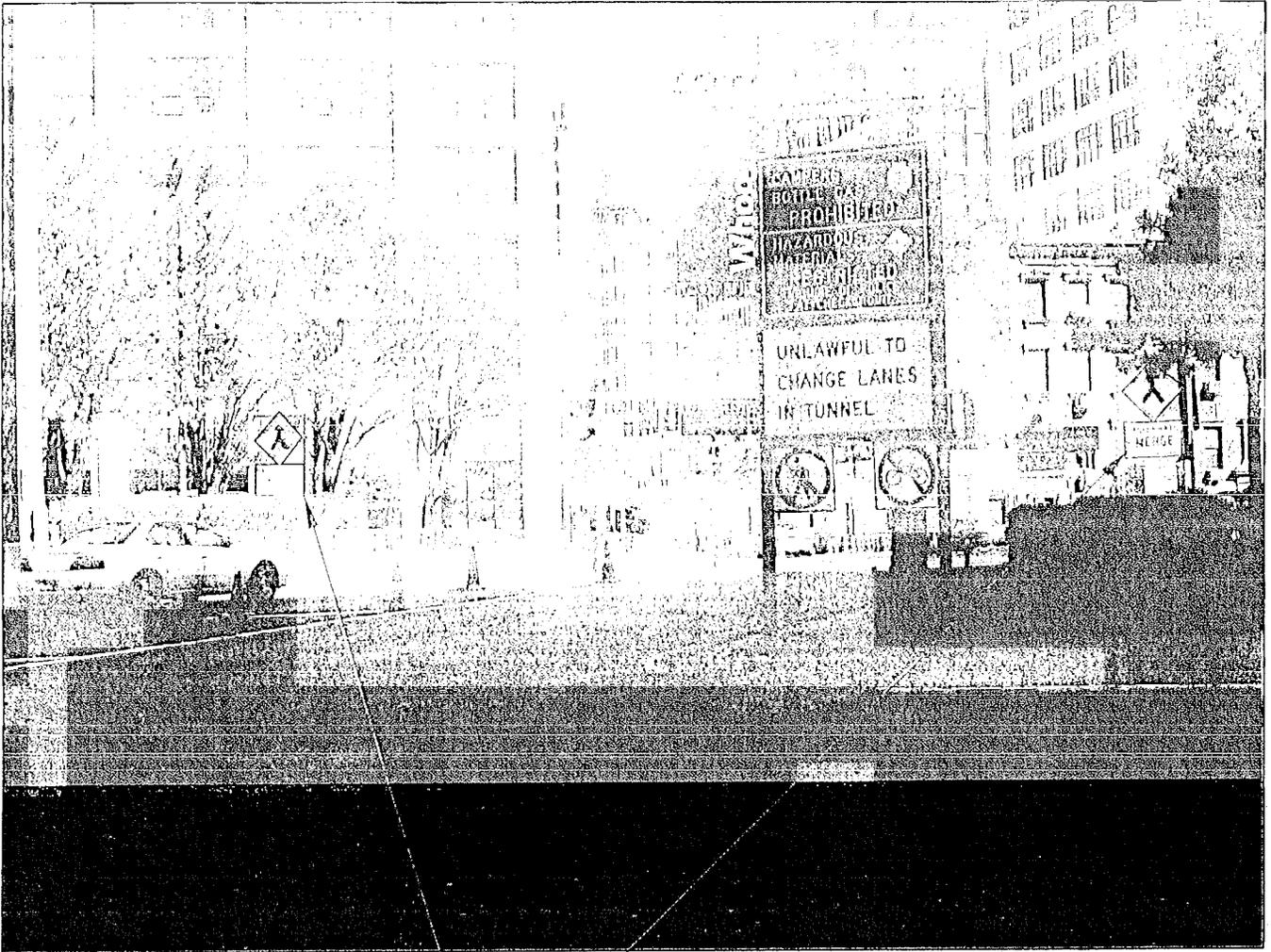
Install Sign "A" and
Sign "B" on new post
and face to traffic.
See sheet 3.



Install Sign "A" and
Sign "B" on sign structure.
Mount Sign "A" and
Sign "B" at 7' height and
face to traffic.
See sheet 3.



Install Sign "A" and Sign "B" on sign structure. Mount Sign "A" and Sign "B" at 7' height and face to traffic. See sheet 3.



Remove existing warning signs.
Install Sign "A" and Sign "B" at same location (Typical).
See sheet 3.

SIGN SERVICE REQUEST

THIS FORM (PA1821A) IS FOR USE BY TRAFFIC ENGINEERING STAFF ONLY
(FACILITY AND LINE DEPARTMENT STAFF SHOULD USE FORM PA1821 TO REQUEST SIGNS, ETC.)

SSR NUMBER
2011-20

FACILITY HT	DATE ORIGINATED 6/21/2011	DATE REC'D BY T.E. 6/21/2011	DATE REQUIRED 7/26/2011	PR,A,B or C B	PRTY.& INIT. (FOR "C" ONLY)
TRAFFIC ENGINEER Shabih, Raheel <i>(S/NK)</i>	TITLE Traffic Engineer		PA TIE LINE & EXT. _04-7841	OUTSIDE TEL. NO. (973) 565-7841	
FACILITY REQUESTOR (IF APPLICABLE)	TITLE		PA TIE LINE & EXT.	OUTSIDE TEL. NO.	
			SPECIAL CHARGE CODE (IF APPLICABLE)		

Pursuant to the authority vested in me by the Executive Director by memorandum dated, June 23, 1963, I hereby authorize the removal of the Sign(s) as described below.

Date: *8.11.11*

Por...
Chief Traffic Engineer

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Describe Sign(s) or other Traffic Control Device(s) required. (Show location in sketch, including all pertinent details. If necessary, attach additional sheets.)

HT-11-015 Remove merge warning sign and plaque

Instructions

Location:

11-015 - Remove merge warning sign and plaque at intersection of Canal Street and Hudson Street (see sheet 3).

Remove:

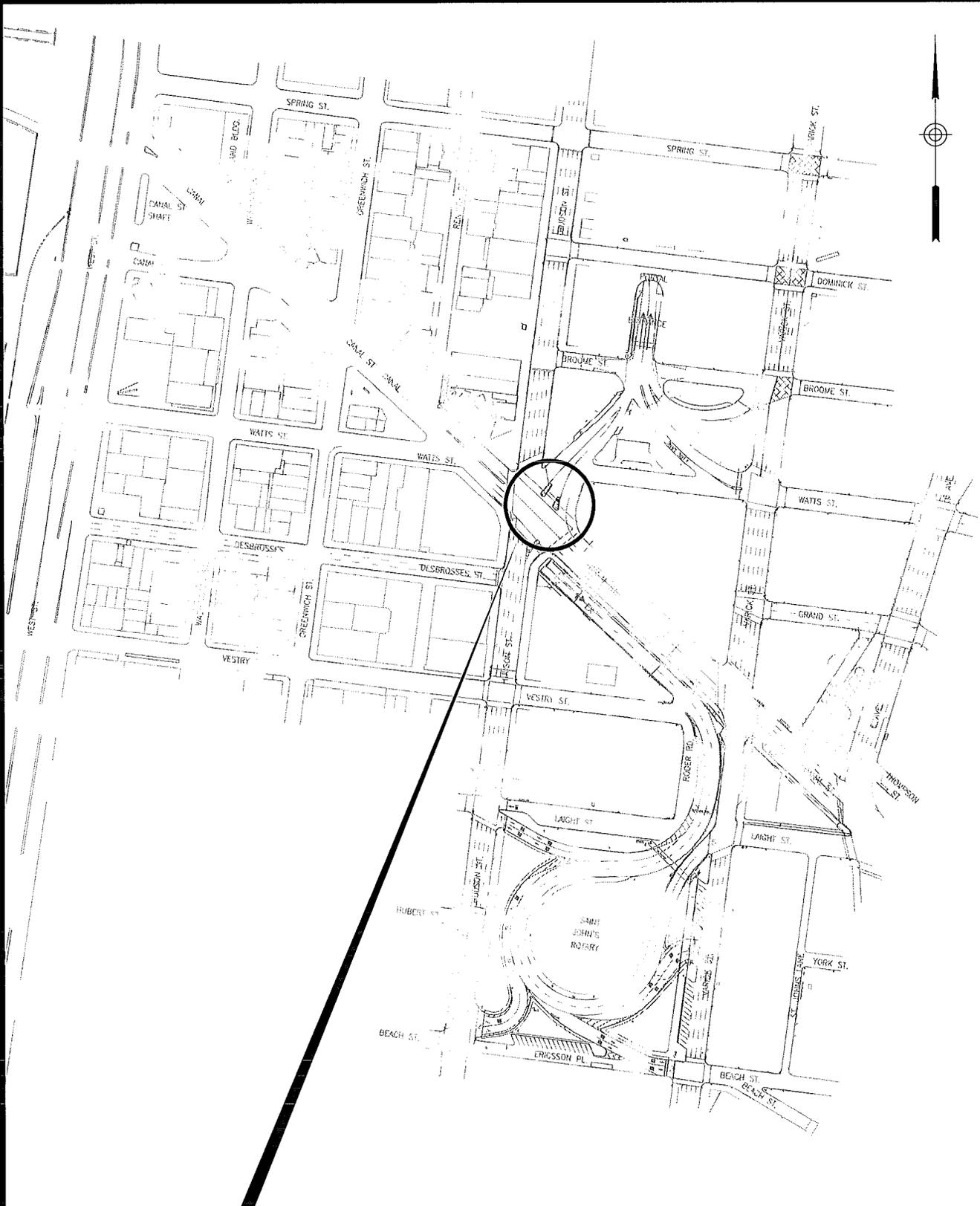
30" x 30" Merge Warning Sign (see sheets 3 and 4)
24" x 42" "Take Turns Merging" Plaque (see sheets 3 and 4)

Totals:

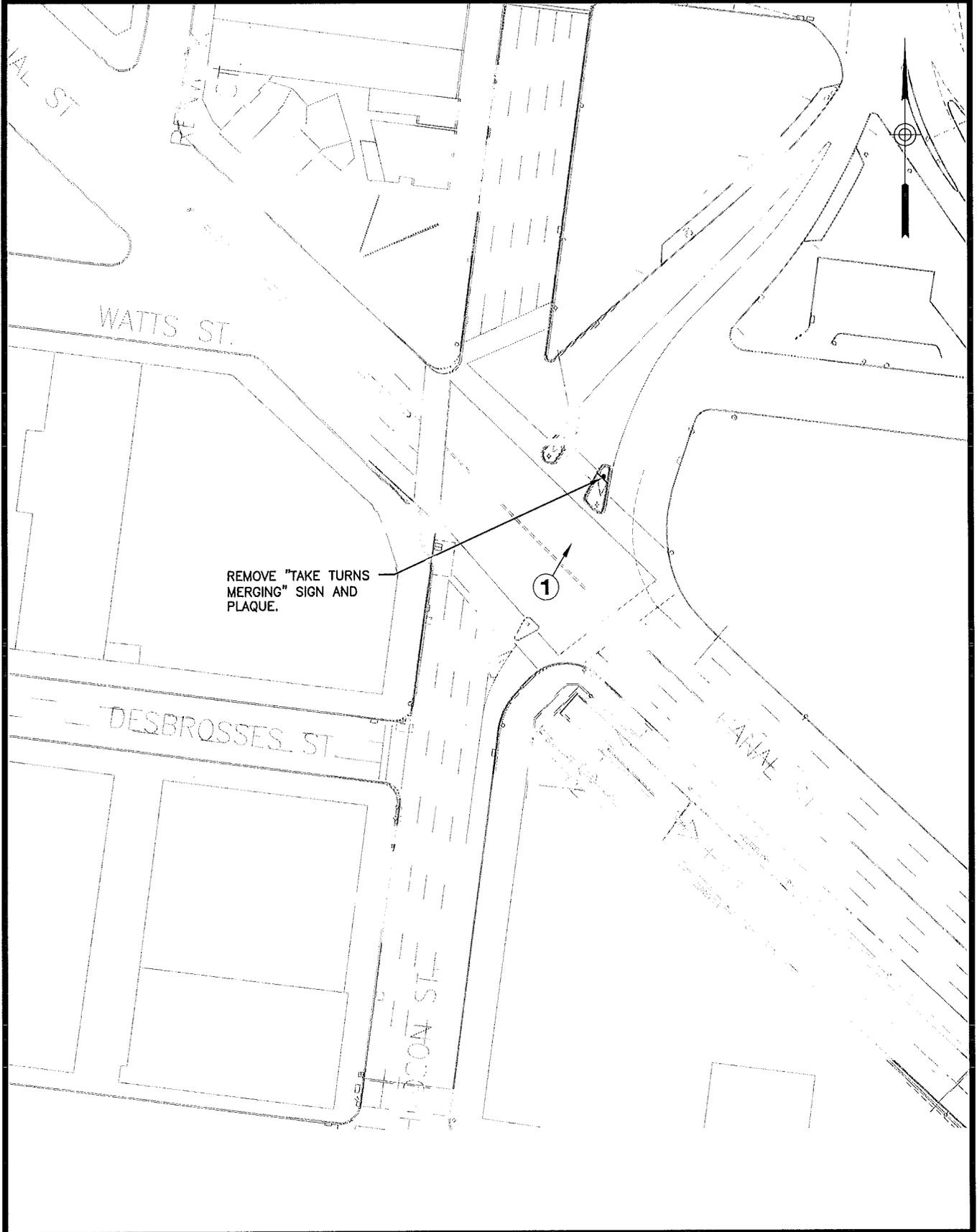
Remove 13.25 SF of existing warning signs

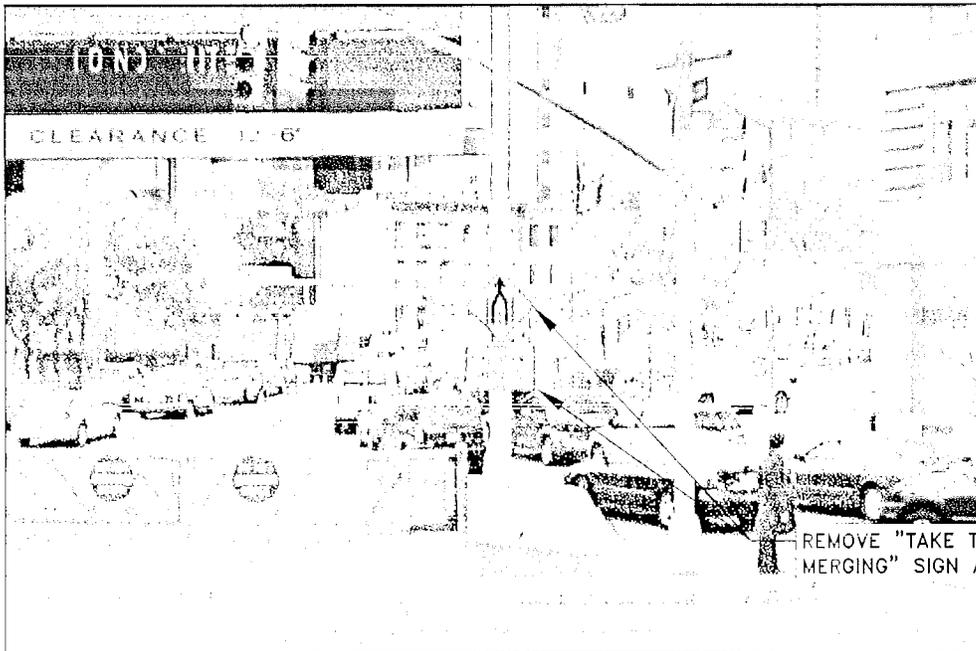
Tracking Number: 7807

DATE RECEIVED	DATE COMPLETED	CREW LEADER	PRO	UNIT	ACT	JOB NUMBER
___/___/___	___/___/___		B02	420	135	916.034



SITE LOCATION





REMOVE "TAKE TURNS
MERGING" SIGN AND PLAQUE

PHOTO 1