

FOI#15518

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HOWARD ENGLE

JEROME EDELMAN (1913-2000)

November 12, 2014

Via FedEx Express Overnight

The Port Authority of New York and New Jersey
Corporate Offices
225 Park Avenue South
New York, NY 10003
&
The Port Authority of New York and New Jersey
Public Safety Department, MDA Unit
241 Erie Street, Room 302
Jersey City, NJ 07310

Attn: Officer Curtin - Shield# 2295

Re: Injured Party: John S. Conte
Date and time of incident: 11/3/2014 at approximately 4pm
Case No. 29236
Location: JFK/BLDG77

11-24-14A11:31 RCVD

Dear Sir/Madam:

This law office represents John Conte. Mr. Conte was the victim of a motor vehicle accident which occurred on November 3, 2014 at approximate 4 p.m. in the parking lot in front of Building 77 (the T.N.T. side of lot) in John F. Kennedy Airport, Jamaica, New York 11430.

Mr. Conte is an employee of United States Custom and Border Protection. On the date and time stated, Mr. Conte was a pedestrian walking in this parking lot. He was struck by an orange and white colored van with the designation of TNT.com. The Port Authority Police responded to the scene, emergency personnel and an ambulance also responded to the scene.

We understand that there are security/surveillance cameras which include coverage of the location where the accident happened and also include coverage of nearby and adjacent areas, access roads and streets which would show where the van came from before the collision and where Mr. Conte came from.

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We request that all files and images of these cameras be preserved. We hereby put you on notice that an application will be filed in the appropriate court to demand the preservation and production of the files and images from these cameras.

Since you are now aware of the significance of these materials, please be advised that no portions of these digital files or images for this day are to be deleted, overwritten or erased.

We request that you now preserve these files and images pending the order of the Court.

Please be further advised that the subject files and images not only concern the happening of the accident, but also the images of investigation by Port Authority Police, the response, the emergency personnel and the ambulance response and potential witnesses.

We also request that the digital files and images for adjacent and nearby areas of the parking lot and access roads and entrances and exits be preserved so that we can determine where the vehicle which struck Mr. Conte came from, where it went and how long before the accident the vehicle was in the parking lot.

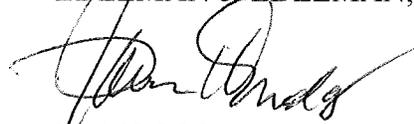
These files and images may be from more than one camera. We advise you, that the files and images for all such cameras be preserved.

I am quite sure that the court will agree with our position that all of this information is material and relevant to a complete and thorough investigation of this occurrence.

If your office believes that any materials in these digital files or images should remain confidential then I suggest that your position be raised by your attorneys in Court instead of any unilateral decision on your part to erase or delete these materials.

Thank you for your anticipated cooperation.

Very truly yours
EDELMAN & EDELMAN, P.C.



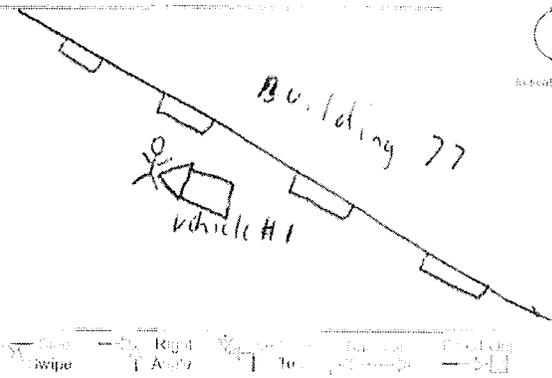
Paul H. Maloney

1. Motor Vehicle Crash No. 29236	2. Date of Crash 11/03/14	3. Date Reported 11/03/14	4. Facility JFK IA	5. Police Command JFK	6. Reference No. (Engineering Use)	Page 1 of 1
6. Day of Week MON	7. Time (24 Hours) 1605	8. Appended Report <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	9. Photos <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	10. Property Damage <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	11. PA Property Damage <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	12. Damaged Location Building 77 Final of Loading docks
14. Reporting Officer's Name (Print) CURTIN	15. Officer No. 2255	16. Reporting Officer's Dept. No. 72	17. Supervisor's Name (Print) JOSEPHANTONIO	18. Supervisor's No. 742	19. Supervisor's Dept. No. 604	20. Officer's Name (Print) GUEMAN, EDUARDO, R
21A. No. Street	22B. No. Street	21A. City, State, Zip	21B. City, State, Zip	21A. Date of Birth	21B. Date of Birth	21A. License No.
27A. License No.	27B. License No.	27A. Exp. Date	27B. Exp. Date	27C. Exp. Date	27D. Exp. Date	27E. Exp. Date
28. Owner's Name (from Registration)	29. Owner's Name (from Registration)	30. Owner's Name (from Registration)	31. Owner's Name (from Registration)	32. Owner's Name (from Registration)	33. Owner's Name (from Registration)	34. Owner's Name (from Registration)
35A. Passengers	35B. City	35C. Year	35D. Make	35E. Model	35F. Color	35G. VIN
36A. Insurance Carrier Name	36B. Insurance Policy No.	36C. Insurance Policy No.	36D. Insurance Policy No.	36E. Insurance Policy No.	36F. Insurance Policy No.	36G. Insurance Policy No.

37. Driver's License No.	38. Driver's License No.	39. Driver's License No.	40. Driver's License No.	41. Driver's License No.	42. Driver's License No.	43. Driver's License No.
44. Driver's License No.	45. Driver's License No.	46. Driver's License No.	47. Driver's License No.	48. Driver's License No.	49. Driver's License No.	50. Driver's License No.
51. Driver's License No.	52. Driver's License No.	53. Driver's License No.	54. Driver's License No.	55. Driver's License No.	56. Driver's License No.	57. Driver's License No.

56. Crash Description
 Pedestrian states he was exiting the building after work and was struck by the front of the vehicle causing injury. Driver of vehicle states he was driving towards the loading bay and was temporarily blinded by the sun and said pedestrian stepped into the path of his vehicle.

57. Veh. No.	58. Age	59. Pos.	60. Safety Device	61. Eject	62. Injury Severity	63. M/F	64. Injury Area	65. Taken By	66. Taken To	67. Name and Address of All Vehicle Occupants or Pedestrians	68. Refused Medical
A 01	49	01	02	1	5	M		504	6639	GUEMAN, EDUARDO	<input type="checkbox"/>
B P	49					M	09			CONTE, JUANIS	<input type="checkbox"/>
C											<input type="checkbox"/>



THE PORT AUTHORITY OF NY & NJ

FOI Administrator

December 12, 2014

Mr. Paul H. Maloney
Edelman & Edelman, P.C.
61 Broadway
New York, NY 10006

Re: Freedom of Information Reference No. 15518

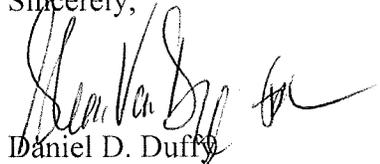
Dear Mr. Maloney:

This is a response to your November 12, 2014 request, which has been processed under the Port Authority's Freedom of Information Code, copy enclosed, for a copy of the security/surveillance cameras video related to John Conte's accident on November 3, 2014 at approximately 4 p.m. in the parking lot in front of Building 77 (the T.N.T. side of lot) in John F. Kennedy Airport.

Please be advised that we have searched our files and found no documents responsive to the request.

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

Sincerely,



Daniel D. Duffy
FOI Administrator

Enclosure