

A Public Records Access request has been submitted.

Request By: Andrew D. Showers

Signature: Andrew D. Showers

Request date: 07/07/2016

Address: 55 Washington Street - Suite 720, Brooklyn, NY11201

Email: ashowers@mmglawyers.com

Phone number: 212-747-1230

Personal  
Information Request: NO

Records seeking: Kindly provide all Notices of Claim, Amended Notices of Claim, Corrected Notices of Claim, etc. for Emetria Olivares (DOB: [REDACTED] in connection with an alleged accident on August 23, 2012 at JFK Airport, Terminal 4, Queens, New York.

THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY  
PUBLIC RECORD ACCESS FORM

PRA 17145

Action by (print / type name):

William Shalewitz

, Freedom of Information Administrator

Signature:



Date:

08/01/2016

On behalf of the Secretary of the Port Authority, as Records Access Officer and Custodian of Government Records of the Port Authority.

The requested records are being made available.

Any responsive records that may exist are currently in storage or archived, and a diligent search is being conducted. The Port Authority will respond by:

A diligent search has been conducted, and no records responsive to your request have been located.

The requested records that have been located are not being made available, as they are exempt from disclosure for the following specific reasons:

Some requested records that have been located are being made available. The remainder are exempt from disclosure for the following specific reasons:

**Personal privacy.**

The request does not reasonably describe or identify specific records; therefore, the Port Authority is unable to search for and locate responsive records. Please consider submitting a new request that describes or identifies the specific records requested with particularity and detail.

Other:

Material responsive to your request can be found on the Port Authority's website at <http://corpinfo.panynj.gov/documents/17145-O/>.

This form is promulgated by the Port Authority pursuant to the Port Authority Public Records Access Policy and is intended to be construed consistent with the New York Freedom of Information Law and the New Jersey Open Public Records Act. It is intended to facilitate requests for Port Authority public records and does not constitute legal advice.

**NOTICE OF CLAIM**

-----X  
In the Matter of the Claim of

Emetria Oliveres

- against -

PORT AUTHORITY OF NY & NJ  
OFFICE OF THE SECRETARY

2012 NOV 20 P 12: 56

PORT AUTHORITY OF NEW YORK & NEW JERSEY and THE CITY OF NEW YORK

-----X  
TO: The Port Authority of New York & New Jersey,  
225 Park Avenue South, 18<sup>th</sup> floor,  
New York, New York 10003

The Comptroller of the City of New York  
Municipal Building, New York, New York 10007

PLEASE TAKE NOTICE that the undersigned claimant hereby makes claim and demands against you as follows:

**1. Name and post office address of each claimant and claimant's attorneys is:**

**Claimant**

EMETRIA OLIVERES  
[REDACTED]  
[REDACTED]

**Attorney**

Ferro, Kuba, Mangano, Sklyar, P.C.  
424 West 33<sup>rd</sup> Street, Ste. 440 /  
New York, NY 10001  
(212) 244-7676

**2. Nature of Claim:** The nature of the claim is for severe and permanent personal injuries sustained by Emetria Oliveres and all other damages allowed by statute and case law as a result of the negligence, carelessness, recklessness and gross negligence of the PORT AUTHORITY OF NEW YORK & NEW JERSEY and THE CITY OF NEW YORK their agents, servants, licensees contractors, subcontractors, employees and other affiliates agencies and departments, without any contributory negligence on the part of the claimant.

**3. The time when, the place where and the manner in which the claim arose:** The accident arose on August 23, 2012, at approximately 7:00A.M. at John F. Kennedy International Airport, Terminal 4, top level/departure area, County of Queens, City and State of New York. While claimant, EMETRIA OLIVERES was walking through the entrance of the departure area for Terminal 4, near the interior vestibule door inside door #3, she was caused to slip, trip and fall and be violently precipitated to the ground as a result of water and/or slippery substance on the floor, resulting in severe, personal and permanent injuries to said claimant as a result of the negligence, carelessness and recklessness of the PORT AUTHORITY OF NEW YORK & NEW JERSEY and THE CITY OF NEW YORK, its agents, servants, licensees contractors, subcontractors, employees and other affiliates agencies and departments, and those acting under

its direction, behest, permission and control in the ownership, operation, designing, creating, management, maintenance, contracting, subcontracting, supervision, authorizing use and control of John F. Kennedy International Airport, Terminal 4, County of Queens, City and State of New York, in failing to properly maintain said entranceway; in allowing the water and/or slippery substance to remain at said entranceway, ; in causing, permitting and allowing a trap, hazard and nuisance to be and exist for an excessive and unreasonable period of time, despite actual, constructive, and prior written notice; in failing to take any necessary steps to alleviate said condition; in failing to undertake proper and/or adequate safety studies and/or surveys; in failing to properly repair said entranceway before authorizing its use; in failing to erect barricades, or otherwise restrict use of aforesaid area to prevent a hazard, trap and nuisance from endangering the general public and, more particularly, claimant herein; in failing to warn the general public and, more particularly, claimant herein, of the subject hazard, trap and nuisance; in permitting and allowing the aforesaid condition to exist at the entranceway thereat; in failing to avoid the aforesaid accident which was foreseeable; and in being otherwise negligent, careless, and reckless in the premises.

4. Claimant, EMETRIA OLIVERES, sustained severe permanent personal injuries, the full extent of which is not presently known, including but not limited to, upon information and belief, injuries to the left arm, fractured left arm, face, teeth, head, neck, legs, knees and back. Claim is for personal injuries, hospital, physician and other medical expenses, pain and suffering, loss of quality and/or enjoyment of life, and all other damages to which claimant is entitled to by case law and statute.

Said claim and demand is hereby presented for adjustment and payment. You are hereby notified that unless they are adjusted and paid within the time provided by law from the date of presentation to you, the claimant intends to commence an action in these claims. Claimant Emertia Oliveres has been damaged in an amount in excess of the jurisdictional limits of the lower courts and to be determined by a trier of facts.

Dated: New York, New York  
November 16, 2012

  
REBECCA FORTNEY

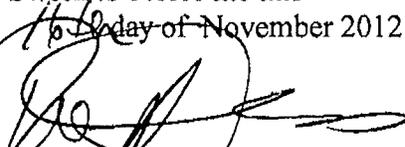
**VERIFICATION**

STATE OF NEW YORK, COUNTY OF NEW YORK)ss.:

REBECCA FORTNEY, being duly sworn, deposes and says that deponent is the above-named claimant; deponent has read the foregoing NOTICE OF CLAIM and knows its contents; the same is true to deponent's knowledge, except as to those matters stated to be alleged upon information and belief, and as to those matters deponent believes it to be true.

  
REBECCA FORTNEY

Sworn to before me this  
~~16~~ day of November 2012

  
Notary Public

**Ferro, Kuba, Mangano, Sklyar, P.C.**  
Attorneys for Claimant  
Emertia Oliveres  
424 West 33<sup>rd</sup> Street, Ste. 440  
New York, NY 10001  
(212) 244-7676  
File No.: P14717-12

2012 NOV 20 P 1:12

LAW DEPARTMENT  
PORT AUTHORITY CLAIMS

**AMENDED NOTICE OF CLAIM**

-----X  
In the Matter of the Claim of

Emetria Oliveres

- against -

PORT AUTHORITY OF NEW YORK & NEW JERSEY  
-----X

PORT AUTHORITY OF NEW YORK & NEW JERSEY

2012 DEC 19 A 11:55

TO: The Port Authority of New York & New Jersey,  
225 Park Avenue South, 18<sup>th</sup> floor,  
New York, New York 10003

PLEASE TAKE NOTICE that the undersigned claimant hereby makes claim and demands against you as follows:

**1. Name and post office address of each claimant and claimant's attorneys is:**

**Claimant**  
EMETRIA OLIVERES



**Attorney**  
Ferro, Kuba, Mangano, Sklyar, P.C.  
424 West 33<sup>rd</sup> Street, Ste. 440  
New York, NY 10001  
(212) 244-7676

**2. Nature of Claim:** The nature of the claim is for severe and permanent personal injuries sustained by Emetria Oliveres and all other damages allowed by statute and case law as a result of the negligence, carelessness, recklessness and gross negligence of the PORT AUTHORITY OF NEW YORK & NEW JERSEY their agents, servants, licensees contractors, subcontractors, employees and other affiliates agencies and departments, without any contributory negligence on the part of the claimant.

**3. The time when, the place where and the manner in which the claim arose:** The accident arose on August 23, 2012, at approximately 7:00A.M. at John F. Kennedy International Airport, Terminal 4, top level/departure area, County of Queens, City and State of New York. While claimant, EMETRIA OLIVERES was walking through the entrance of the departure area for Terminal 4, near the interior vestibule door inside door #3, she was caused to slip, trip and fall and be violently precipitated to the ground as a result of a defective sliding door which closed on her arm causing her to be propelled forward and water and/or slippery substance on the floor, resulting in severe, personal and permanent injuries to said claimant as a result of the negligence, carelessness and recklessness of the PORT AUTHORITY OF NEW YORK & NEW JERSEY, its agents, servants, licensees contractors, subcontractors, employees and other affiliates agencies and departments, (and those acting under its direction, behest, permission and control in the ownership, operation, designing, creating, management, maintenance, contracting, subcontracting, supervision, authorizing use and control of John F. Kennedy International

0627  
CLERK OF SUPERIOR COURT  
IN SENeca AVENUE

Airport, Terminal 4, County of Queens, City and State of New York, in failing to properly maintain said entranceway; in allowing the water and/or slippery substance to remain at said entranceway, ; in causing, permitting and allowing a trap, hazard and nuisance to be and exist for an excessive and unreasonable period of time, despite actual, constructive, and prior written notice; in failing to take any necessary steps to alleviate said condition; in failing to undertake proper and/or adequate safety studies and/or surveys; in failing to properly repair said entranceway before authorizing its use; in failing to erect barricades, or otherwise restrict use of aforesaid area to prevent a hazard, trap and nuisance from endangering the general public and, more particularly, claimant herein; in failing to warn the general public and, more particularly, claimant herein, of the subject hazard, trap and nuisance; in permitting and allowing the aforesaid condition to exist at the entranceway thereat; in failing to avoid the aforesaid accident which was foreseeable; and in being otherwise negligent, careless, and reckless in the premises.

4. Claimant, EMETRIA OLIVERES, sustained severe permanent personal injuries, the full extent of which is not presently known, including but not limited to, upon information and belief, injuries to the left arm, fractured left arm, face, teeth, head, neck, legs, knees and back. Claim is for personal injuries, hospital, physician and other medical expenses, pain and suffering, loss of quality and/or enjoyment of life, and all other damages to which claimant is entitled to by case law and statute.

Said claim and demand is hereby presented for adjustment and payment. You are hereby notified that unless they are adjusted and paid within the time provided by law from the date of presentation to you, the claimant intends to commence an action in these claims. Claimant Emertia Oliveres has been damaged in an amount in excess of the jurisdictional limits of the lower courts and to be determined by a trier of facts.

Dated: New York, New York  
December 10, 2012

  
REBECCA FORTNEY

VERIFICATION

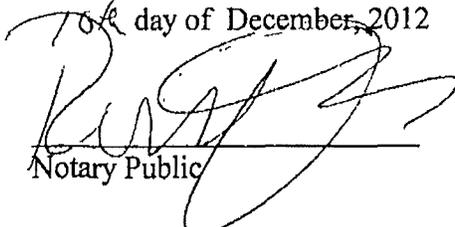
STATE OF NEW YORK, COUNTY OF NEW YORK)ss.:

REBECCA FORTNEY, being duly sworn, deposes and says that deponent is the above-named claimant; deponent has read the foregoing NOTICE OF CLAIM and knows its contents; the same is true to deponent's knowledge, except as to those matters stated to be alleged upon information and belief, and as to those matters deponent believes it to be true.

  
REBECCA FORTNEY

Sworn to before me this

~~70<sup>th</sup>~~ day of December, 2012

  
Notary Public

Rosemarie C. Jones  
Notary Public, State of New York  
No. 01JO4924662  
Qualified in Suffolk County  
Commission Expires March 14, 2014

**Ferro, Kuba, Mangano, Sklyar, P.C.**

Attorneys for Claimant

Emertia Oliveres

424 W, 33<sup>rd</sup> Street, Suite 440

New York, NY 10001

(212) 244-7676

File No.: P14717-12

**AMENDED NOTICE OF CLAIM**

-----X

In the Matter of the Claim of

Emetria Oliveres

- against -

PORT AUTHORITY OF NEW YORK & NEW JERSEY

-----X

TO: The Port Authority of New York & New Jersey,  
225 Park Avenue South, 18<sup>th</sup> floor,  
New York, New York 10003

PLEASE TAKE NOTICE that the undersigned claimant hereby makes claim and demands against you as follows:

**1. Name and post office address of each claimant and claimant's attorneys is:**

**Claimant**

EMETRIA OLIVERES



**Attorney**

Ferro, Kuba, Mangano, Sklyar, P.C.  
424 West 33<sup>rd</sup> Street, Ste. 440  
New York, NY 10001  
(212) 244-7676

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PORT AUTHORITY OF NEW YORK & NEW JERSEY  
OFFICE OF THE CLERK

2012 DEC 19 AM 11:55

Airport, Terminal 4, County of Queens, City and State of New York, in failing to properly maintain said entranceway; in allowing the water and/or slippery substance to remain at said entranceway, ; in causing, permitting and allowing a trap, hazard and nuisance to be and exist for an excessive and unreasonable period of time, despite actual, constructive, and prior written notice; in failing to take any necessary steps to alleviate said condition; in failing to undertake proper and/or adequate safety studies and/or surveys; in failing to properly repair said entranceway before authorizing its use; in failing to erect barricades, or otherwise restrict use of aforesaid area to prevent a hazard, trap and nuisance from endangering the general public and, more particularly, claimant herein; in failing to warn the general public and, more particularly, claimant herein, of the subject hazard, trap and nuisance; in permitting and allowing the aforesaid condition to exist at the entranceway thereat; in failing to avoid the aforesaid accident which was foreseeable; and in being otherwise negligent, careless, and reckless in the premises.

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Dated: New York, New York  
December 10, 2012

  
REBECCA FORTNEY

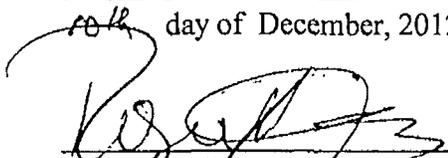
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REBECCA FORTNEY

Sworn to before me this  
~~20th~~ day of December, 2012

  
Notary Public

Rosemarie C. Jones  
Notary Public, State of New York  
No. 01JO4924662  
Qualified in Suffolk County  
Commission Expires March 14, 2014

**Ferro, Kuba, Mangano, Sklyar, P.C.**  
Attorneys for Claimant  
Emertia Oliveres  
424 W, 33<sup>rd</sup> Street, Suite 440  
New York, NY 10001  
(212) 244-7676  
File No.: P14717-12

2012 DEC 19 P 12:26  
LAW DEPARTMENT  
PORT AUTHORITY CLAIMS