

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

In the Matter of the Application of :
PATROLMEN’S BENEVOLENT ASSOCIATION :
OF THE CITY OF NEW YORK, INC., :

Petitioner

for a Judgment Pursuant to Article 78 of the :
Civil Practice Law and Rules :

- against -

BILL DE BLASIO, IN HIS OFFICIAL :
CAPACITY AS MAYOR OF THE CITY OF :
NEW YORK, CITY OF NEW YORK, JAMES :
P. O’NEILL, IN HIS OFFICIAL CAPACITY AS :
COMMISSIONER OF THE NEW YORK CITY :
POLICE DEPARTMENT, and NEW YORK :
CITY POLICE DEPARTMENT,

Respondents.

Index No. 150181/2018

Hon. Shlomo S. Hagler

Mot. Seq. No. 004

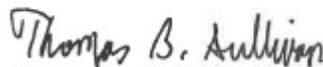
NOTICE OF MOTION TO INTERVENE

PLEASE TAKE NOTICE that upon the attached Affirmation of Thomas B. Sullivan, dated March 1, 2018, in support of the Motion to Intervene by the Reporters Committee for Freedom of the Press, Hearst Corporation, The Associated Press, BuzzFeed, Cable News Network, Inc., The Center for Investigative Reporting, Daily News, LP, Dow Jones & Company, Inc., Gannett Co., Inc., Gizmodo Media Group, LLC, New York Public Radio, The New York Times Company, NYP Holdings, Inc., and Spectrum News NY1 (collectively, “News Media Intervenors”); the exhibits appended to that Affirmation; and the accompanying Memorandum of Law in Support of the Motion to Intervene, undersigned counsel for the News Media Intervenors

will move this Court, in the Submissions Part, located at the Supreme Court of the State of New York, Room 130 of the Courthouse located at 60 Centre Street, New York, New York on March 22, 2018 at 9:30 a.m., or as soon thereafter as counsel may be heard, to issue an order pursuant to Rule 7802(d) of the New York Civil Practice Laws and Rules granting the News Media Intervenors leave to intervene in this matter for the purpose of asserting their right of access to police body-worn camera video footage under New York law, including, but not limited to, under New York's Freedom of Information Law, N.Y. Pub. Off. Law §§ 84-90 ("FOIL").

PLEASE TAKE FURTHER NOTICE that because this Notice of Motion was served at least sixteen days before the motion is scheduled to be heard, answering papers and any notice of cross-motion, with supporting papers, if any, shall be served at least seven days before such time, in accordance with New York CPLR § 2214(b).

Dated: New York, New York
March 1, 2018



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