



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, N.Y. 10007-2601

MICHAEL A. CARDOZO
Corporation Counsel

AMANDA C. GOAD
Assistant Corporation Counsel
phone: (212) 788 - 1145
fax: (212) 788 - 1619
email: agoad@law.nyc.gov

October 17, 2007

Hon. Joan Madden
Individual Assignment Part 11
New York State Supreme Court, New York County
60 Centre Street, Courtroom 351
New York, New York 10007

VIA ELECTRONIC MAIL

Re: *Greenberg et al. v. Bloomberg et al.*, Index No. 2007-100760
Emergency Coalition to Save Washington Square Park, Index No. 2007-102194

Dear Justice Madden:

Counsel for the Greenberg petitioners in the above-captioned litigation has requested an update on the status of the Washington Square Park renovation project, and the City wishes to keep Your Honor apprised of the project's status as well.

A contract has not been formally awarded for Phase I of the renovation work. The City presently anticipates that work on the project will not begin this month. The City has previously committed to notify opposing counsel and the Court at least seven days in advance of the commencement of any renovation-related construction work in the Park, should these matters still be within the Court's jurisdiction at that time.

Thank you for your consideration in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Amanda C. Goad". The signature is fluid and cursive, with the first name being the most prominent.

Amanda C. Goad
Assistant Corporation Counsel
Environmental Law Division

cc: Arlene Boop, Esq., counsel for *Greenberg* petitioners
Joel Kupferman, Esq., counsel for *Emergency Coalition* Petitioners