Civil Co	urt	of the City of New Yo	rk	Page 1 Date: of 7	2001	2001 03	30		
County of	King	s, Housing Part		Index No. LT	уууу 70826/0	<i>mm</i>	da		
Rama & Ma	njula,	LLC (A Corporation)		nt's Affidavit in					
		Petitioner-Landlord	and						
		against	T	o Restore to the	Calenda	r			
Christine Fy	e and	"John Doe"	Address:	26 Bushwick	26 Bushwick Avenue				
		Respondent-Tenant(s)	<i>Apt</i> : 2-F	Brooklyn, NY	ZIP	11211	l		
State of New	:	County of Kings, ss: obert Pollard (John Doe)	being duly sw	orn, deposes and s	ays:				
1. Party	X	a) I am a tenant named as a resp b) I am a person claiming possess			edings.				
	-	and I am the	of a tenant na	med above					
2. Service and Answer	X	I - or another named tenant - rec proceedings, filed and answer in	the Clerk's Offi	ce and received a d	late for tria	al	d		
		I received a Holdover Notice of I			nau alrea(iy passe	:u 		
3. Excuse		On the date of the Trial or Resol a) a Judgment was entered again My reason for not appearing in C	st me by default	for my failure to a		lution i	,		

X	b) a Judgment was entered but I X the Landlord	after trial <i>failed to comply</i> with th	X after stipulation the Order of the Court because:
	The Landlord has failed to mak settlement - with the minor exc sink. Consequently, in conjunc have to pay any rent until the r - we have not yet been in a pos	the repairs that are re- ception of repairing a least tion the advice from the repairs had been complet	quired by the stipulation of king drain from the kitchen e Judge that we would not ted - noted below in Section 4

Page 2	Date:	2001	03	30	
		уууу	mm	dd	

Index No. LT 07826/00

4.	I alleg	e that I have a good defense because:	
Defense		I was improperly served	petitioner is not the owner
		the amount being claimed is incorrect	X no rent was demanded
		there is credit due for rent overcharge	the rent has been partially/fully paid
		the rent has been offered but refused	I have been harassed
			which need repair, or services which have not been
		X heat	health and safety
		X hot water	other sanitary conditions
		electrical	pests & vermin
		X oven / stove	plumbing
		X refrigerator	walls & paint
		X security	garbage
		doors / windows	recycling
		X other - describe Doorbell	(
		X Explain rent payments, if any, or other of	defense:
		and the Judge had stated clearly that n	Landlord has failed to make the required repairs - no rent is to be paid until the repairs have been on and Order of March 13 and the (cont. page 3)
5. Request	X	I request that the Judgment be vacated, that granted permission to serve these papers in p	t the case be restored to the calendar, and that I be person
6.		I have not had a previous Order to Show Cau	ause regarding this index number
Prior Order	X		regarding this index number, but I am making this
			ith the terms of the stipulation; the Decision and bes not comply with the "Recitation, as required ed in the review of this Motion" (cont. page 5)
Sworn to me	this	30 day of March 20 01	
	•••	······································	
			Signature of Tenant / Respondent
	Signa	ature of Court Employee and Title	

30 Page **3** Date: 2001 03 ł уууу dd mm

•••

•••

Index No. LT 70826/00

inuation of:	<u> </u>	Excuse	X	Defense		Request		Prior Order
relating to t	he Pet	titioner's fai	lure to	o register the pre				
become incr the defects i present ade a forthcomi supporting e	reasing in the quatel ng sup eviden	gly aware to adjudicatio y reasoned a plementary ice - on the	be ge n of th argum Affid more	rmane to the ca he initial Stipula hents as to these avit. The argum fundamental iss	se - ha ition c defec ients, ue in	as helped us t of Settlement. ts in this Affie however, will the case - nar	to und The davit place mely t	derstand in a new light the nature of exigencies of time do not permit us to and we will prepare such arguments in e far greater emphasis - and provide the Court's failure to uphold the equal
represented accessible ru information	by an ules an syster	attorney is nd procedur n, aggravate	severe es for ed by t	ely undermined the Court and i the extremely ca	by the ts Res aseloa	e absence of c olution Part, d of the Cour	clear, by an t, and	consistent, understandable and a overburdened and inadequate d that the Court's failure to provide
Court's failu	ire to j	provide equ	ial pro	tection under th	ne law			
feasibility of modeled on Judgment, in to describe - enabling th comparable supplement	f collec the C ncorpo relevan he Cou detail ary pag	cting and or court's existi orating a fev nt details; it urt's record to the docu	rganizi ing for w mino t also j to refi ument	ing the Court's i rm for an Affida or revisions in fo provides space fo lect habitability ation of rent-rel	nform vit in ormat or a te issues lated i	ation and doo Support of an - including a enant to docu s - frequently a ssues in the A	cume n Ord largen ment a prin Affida	ntation in electronic form. The form is er to Show Cause to Vacate a r font - and more space for the tenant the nature of repairs that are required mary concern of tenants - in wit. The form also provides for
can "Tab" ju currently av copies of the With a fairly within whic clear and ur parties, inclu- has been ma remedies, In http://hous	ust to vailable e form y simp h ther ndersta uding ade for nforma ing-co	the fields the e in WordPo- to be dowr ele program, re will be fie andable case ready acces r all docume ation Habita purt-of-king	hat car erfect hloade the ir elds con e summ s to the ents to at has s.net -	n be filled in, ind for Windows an od; a web-based 1 nformation from rresponding to t maries that mak ne full text of ele be filed in elec also established on which most	cludin ad Por HTM the fe he fie e the ectron tronic a web of the	g those that r table Docume L version of the orm can be au lds on the for key informati ic copies of de form. As par o site - still un e documents a	equir ent Fe he for itoma m. In ocum ocum t of th der c and e	re completion. Versions of the form are ormat, the latter to allow printable rm is currently under development. atically retrieved into a database, a turn, the database will then generate in the case readily available to all the nents filed in the Court, once provision he development of the proposed onstruction - at vidence filed in this case have been
	clarification relating to t jurisdiction This clarific become incr the defects present ade a forthcomi supporting o protection u We are con represented accessible re information equal protect In the mear Court's failt the form in This form re feasibility of modeled on Judgment, i to describe - enabling t comparable supplement in this Affic The design can "Tab" j currently av copies of th With a fairl within whic clear and un parties, incl has been ma remedies, Ir http://hous	clarification in tha relating to the Pet jurisdiction rather This clarification become increasing the defects in the present adequately a forthcoming sup supporting eviden protection under the We are confident represented by an accessible rules and information system equal protection w In the meantime, Court's failure to p the form in which This form represent feasibility of collect modeled on the C Judgment, incorpor to describe relevant - enabling the Con- comparable detail supplementary pag- in this Affidavit. The design of the can "Tab" just to currently available copies of the form With a fairly simp within which ther clear and understa parties, including has been made for remedies, Informa http://housing-co	clarification in that Decision relating to the Petitioner's fai jurisdiction rather than a mat This clarification - in conjunc- become increasingly aware to the defects in the adjudicatio present adequately reasoned a forthcoming supplementary supporting evidence - on the protection under the law that We are confident that we will represented by an attorney is accessible rules and procedur information system, aggravate equal protection was a critical In the meantime, however, w Court's failure to provide equ the form in which this Affida This form represents an initia feasibility of collecting and on modeled on the Court's exist Judgment, incorporating a few to describe relevant details; if - enabling the Court's record comparable detail to the door supplementary pages that car in this Affidavit. The design of the forms has h can "Tab" just to the fields th currently available in WordP copies of the form to be down With a fairly simple program, within which there will be fie clear and understandable cas parties, including ready acces has been man for all documer remedies, Information Habita http://housing-court-of-king	clarification in that Decision that we relating to the Petitioner's failure to jurisdiction rather than a matter of This clarification - in conjunction we become increasingly aware to be get the defects in the adjudication of the present adequately reasoned argum a forthcoming supplementary Affid supporting evidence - on the more protection under the law that is reco We are confident that we will be all represented by an attorney is severed accessible rules and procedures for information system, aggravated by the equal protection was a critical cont In the meantime, however, we are p Court's failure to provide equal pro- the form in which this Affidavit is he This form represents an initial pilot feasibility of collecting and organizi modeled on the Court's existing for Judgment, incorporating a few mine to describe relevant details; it also p - enabling the Court's record to refi- comparable detail to the document supplementary pages that can be us in this Affidavit. The design of the forms has been st can "Tab" just to the fields that car currently available in WordPerfect copies of the form to be downloade With a fairly simple program, the ir within which there will be fields con- clear and understandable case sum parties, including ready access to the has been made for all documents to remedies, Information Habitat has http://housing-court-of-kings.net -	clarification in that Decision that we had erred in i relating to the Petitioner's failure to register the pro- jurisdiction rather than a matter of proof. This clarification - in conjunction with numerous of become increasingly aware to be germane to the ca the defects in the adjudication of the initial Stipula present adequately reasoned arguments as to these a forthcoming supplementary Affidavit. The argum supporting evidence - on the more fundamental iss protection under the law that is required by the XI We are confident that we will be able to show that represented by an attorney is severely undermined accessible rules and procedures for the Court and i information system, aggravated by the extremely ca equal protection was a critical contributing factor t In the meantime, however, we are proceeding with Court's failure to provide equal protection under th the form in which this Affidavit is being presented. This form represents an initial pilot application of the feasibility of collecting and organizing the Court's i modeled on the Court's existing form for an Affida Judgment, incorporating a few minor revisions in fo to describe relevant details; it also provides space for - enabling the Court's record to reflect habitability comparable detail to the documentation of rent-rel supplementary pages that can be used by tenants w in this Affidavit. The design of the forms has been structured so tha can "Tab" just to the fields that can be filled in, ind currently available in WordPerfect for Windows ar copies of the form to be downloaded; a web-based With a fairly simple program, the information from within which there will be fields corresponding to t clear and understandable case summaries that mak parties, including ready access to the full text of ele has been made for all documents to be filed in elec remedies, Information Habitat has also established http://housing-court-of-kings.net - on which most	clarification in that Decision that we had erred in identif relating to the Petitioner's failure to register the premises jurisdiction rather than a matter of proof. This clarification - in conjunction with numerous other of become increasingly aware to be germane to the case - ha the defects in the adjudication of the initial Stipulation of present adequately reasoned arguments as to these defect a forthcoming supplementary Affidavit. The arguments, supporting evidence - on the more fundamental issue in protection under the law that is required by the XIVth A We are confident that we will be able to show that equal represented by an attorney is severely undermined by the accessible rules and procedures for the Court and its Res information system, aggravated by the extremely caseload equal protection was a critical contributing factor to the In the meantime, however, we are proceeding with the ta Court's failure to provide equal protection under the law the form in which this Affidavit is being presented. This form represents an initial pilot application of the pro- feasibility of collecting and organizing the Court's inform modeled on the Court's existing form for an Affidavit in Judgment, incorporating a few minor revisions in format to describe relevant details; it also provides space for a te - enabling the Court's record to reflect habitability issues comparable detail to the documentation of rent-related i supplementary pages that can be used by tenants who ne in this Affidavit. The design of the forms has been structured so that - witt can "Tab" just to the fields that can be filled in, including currently available in WordPerfect for Windows and Por copies of the form to be downloaded; a web-based HTMI With a fairly simple program, the information from the for within which there will be fields corresponding to the fiel clear and understandable case summaries that make the parties, including ready access to the full text of electron has been made for all documents to be filed in electronic remedies, Inf	 clarification in that Decision that we had erred in identification of the relating to the Petitioner's failure to register the premises as a Multiple jurisdiction rather than a matter of proof. This clarification - in conjunction with numerous other observations, become increasingly aware to be germane to the case - has helped us the defects in the adjudication of the initial Stipulation of Settlement present adequately reasoned arguments as to these defects in this Affi a forthcoming supplementary Affidavit. The arguments, however, will supporting evidence - on the more fundamental issue in the case - nan protection under the law that is required by the XIVth Amendment to We are confident that we will be able to show that equal protection for represented by an attorney is severely undermined by the absence of a accessible rules and procedures for the Court and its Resolution Part, information system, aggravated by the extremely caseload of the Court equal protection was a critical contributing factor to the defective Stip. In the meantime, however, we are proceeding with the task of develog Court's failure to provide equal protection under the law, and as an in the form in which this Affidavit is being presented. This form represents an initial pilot application of the project and can feasibility of collecting and organizing the Court's information and do modeled on the Court's record to reflect habitability issues - frequently comparable detail to the documentation of rent-related issues in the A supplementary pages that can be used by tenants who need more space in this Affidavit. The design of the forms has been structured so that - with appropriate can "Tab" just to the fields that can be filed in, including those that r currently available in WordPerfect for Windows and Portable Docum' copies of the forms has been structured so that - with appropriate can "Tab" just to the fields corresponding to the fields on the for clear and understandable case summaries that make th	clarification in that Decision that we had erred in identification of the defe relating to the Petitioner's failure to register the premises as a Multiple Dwe jurisdiction rather than a matter of proof. This clarification - in conjunction with numerous other observations, conce become increasingly aware to be germane to the case - has helped us to und the defects in the adjudication of the initial Stipulation of Settlement. The present adequately reasoned arguments as to these defects in this Affidavit a forthcoming supplementary Affidavit. The arguments, however, will place supporting evidence - on the more fundamental issue in the case - namely to protection under the law that is required by the XIVth Amendment to the We are confident that we will be able to show that equal protection for ind represented by an attorney is severely undermined by the absence of clear, accessible rules and procedures for the Court and its Resolution Part, by an information system, aggravated by the extremely caseload of the Court, and equal protection was a critical contributing factor to the defective Stipulati In the meantime, however, we are proceeding with the task of developing a Court's failure to provide equal protection under the law, and as an initial e the form in which this Affidavit is being presented. This form represents an initial pilot application of the project and can serve feasibility of collecting and organizing the Court's information and docume modeled on the Court's existing form for an Affidavit in Support of an Ord Judgment, incorporating a few minor revisions in format - including a larger to describe relevant details; it also provides space for a tenant to document - enabling the Court's record to reflect habitability issues - frequently a prin comparable detail to the documentation of rent-related issues in the Affida supplementary pages that can be used by tenants who need more space tha

 Page
 4
 Date:
 2001
 03
 30

 yyyy
 mm
 dd

Index No. LT 70826/00

Continuation of:		Excuse	X	Defense		Request		Prior Order	
administrati	The database / information system - as it becomes implemented - would also be of considerable value and for the administrative needs of the Housing Court, by making possible the provision of a variety of timely reports that can be presented clearly and comprehensively - with as much or as little detail as is needed - and that could greatly the ability to make possible a review and analysis of the Court's caseload.								
remedies, an conjunction Wide Task of the Assoc panel discus the adminis	Mindful of the Judge's concern that case law may not be the most effective way to advance our proposed remedies, and in response to a suggestion made by the Judge, we intend to bring the proposed form - in conjunction with an overview of the proposed remedies and the record of this case - to the attention of the City-Wide Task Force on Housing Reform - and also intend to offer to make a presentation to the Housing Committee of the Association of the Bar of the City of New York - preferably in conjunction with a roundtable dialogue or panel discussion on the opportunities and implication of the Internet and information technology in relation to the administration of justice in Housing Courts in New York city, as well as to bring it to the attention of relevant elected officials and candidates for elective office.								
and its part Campaign f prepared for Headquarte information that the Int	ners wi or Secu r "Istar ors in N and co ernet i	ll be develd ure Tenure Ibul+ 5" - tl Iew York - a ommunicat s evolving a	oping a of the ne Fiv and th ion te is a su	a presentation o e United Nation e Year Review o nat will focus on chnologies in th perintelligent se	f the c s Cent of the demo e cont entient	ase and prope the for Human Habitat Agen Instrating the text of an evo to being that has	osed 1 o Sett da - i trans lving as the	n Habitat: Where Information Lives remedies as a case study for the Global clements, in a report that is being in June 2001, at United Nations formative powers and properties of proof of the Gaia Mind hypothesis e ability to enable a profound global ind protocols for sustainability, justice	
may help to routine and case. It has appear to be communica set of laws t and econom	offer a proce becom e so with tions t han the nics of	a fuller pers dures of thi e a truism - dely unders echnology - ose that ha informatior	pectiv s Cour has b tood t has e ve gov 1, info	e on what has b rt, and on the p become self-evid that this reflects enabled dramatic verned human h	een an roposa ent - t the fa c chan nistory s and r	n unusual case ls for a compi hat "the Inter ct that the In ges in human to date - laws networks - law	e that rehen rnet o terne activ s that	n Habitat's work and activities, and t has been an exception to the normal sive set of remedies proposed in the changes everything"; what does not et - and modern information and vity because it is ruled by a different are based on the properties, principles t differ radically from laws based on	
shared and communica properties o unpreceden facts of a ca	accesso tions t f the w ted ne se as a	ed. In addit echnologies /hole. With w ways by w whole, and	ion, th s, are 1 respe vhich to en	nese properties of making possible, ct to the admin Civil Law Cour able the fashior	of info , for th istration ts - an ning of	rmation, com le first time in on of civil law d parties to ca remedies tha	bined hum , thes ases b t serv	light, and can be freely exchanged, I with the power of information and han history, common access to se properties offer the possibility of before them - will be able to frame the ve what I understand as a central goal from contravention of the law.	

2001 03 Page 5 Date: 30 **Civil Court of the City of New York County of Kings, Housing Part** dd уууу тт Index No. LT 70826/00 Defense **X** Prior Order Continuation of: Excuse Request As Respondents in this case, we have filed numerous motions and affidavits, and have introduced a significant body of evidence material to the case in conjunction with these Motions and Affidavits. In response to the Judge's Interim Order requiring us to provide copies of all the documents we had filed in the case, as the Court's copies had been lost, we had provided a detailed chronological listing of our motions, affidavits and evidence in the case when the papers were presented to the Court, and respectfully request that any final Decision and Order acknowledge all of these papers - including the instant Affidavit - that have been filed in case in the Recitation of the papers considered. While I recognize that this is not a fatal omission, and is one that can readily be corrected, I would humbly submit that the Decision and Order should not be executed until the failure to comply with CPLR 2219(a) is corrected. Furthermore, we are concerned that while these proceedings are in a Civil and not a Criminal, Court, the Decision and Order is severely punitive in nature, by virtue of its lack of provision for a reasonable time - less than two weeks from our receipt of the Decision and Order - for Respondents to make arrangements to move and by virtue of the severity of its impact on our lives and our work, and the severe - and potentially fatal - threat to the viability of timely vital work in critical areas of public health and global policy through my work at the United Nations, as the scheduled eviction for April 2, 2001 comes at a time when the level of my responsibilities in key United Nations proceedings has reached an extremely critical point, where I am on the verge of realizing and making available the fruits of a lifetime's work of public service and vital applied scientific research. The eviction, and the related severe disruption of our lives, including the prospects of our being homeless, would also place in severe jeopardy Christine Fye's employment in a position she has held for less than three months. The modest income from her position - as personal assistant to the Executive Editor of an alternative new media organization - Globalvision / mediachannel.org - has represented a critically needed opportunity for us to begin to move from a precarious existence after a year in which we have had virtually no income or financial assets - and also offers the prospect of an opportunity to return to her earlier career as an award-winning producer and director of film and video - a career whose high point was the 1980 Academy Award for Best Feature-length Documentary for "Best Boy" - a film that she had conceived - having noticed how Philly - the subject of the film, a mentally-retarded man in his fifties whose parents were no longer able to care for him - was not being seen or treated as a person by his family - and had guided the film's direction by a cousin of Philly, and her partner at the time - who actually received the award - without, incidentally, ever publicly acknowledging her role. Meanwhile, I am currently serving as convener of a Communications Working Group for non-governmental organizations (NGOs) participating in preparation for the United Nations General Assembly Special Session on HIV/AIDS that will take place in June 2001 at UN Headquarters in New York, and have established a new Internet domain - hiv-care-aids.net- designs for which includes a pioneering demonstration of the holistic use of information technology in responding to the challenges of HIV/AIDS. These designs include a systematic framework for organizing and making available vital information and communication concerning the epidemic and care, treatment and prevention measures, with a special focus on the value of geographic information systems as key tools for observing, analyzing and monitoring the status of the HIV/AIDS epidemic, and in enabling and planning the mobilization of resources for care, treatment and prevention for people, families and communities affected by the most severe public health emergency in human history.

(Cont. page 6)

2001 03 30 Page Date: **Civil Court of the City of New York County of Kings, Housing Part** dd уууу тт Index No. LT 70826/00 Defense **X** Prior Order Continuation of: Excuse Request I am currently in the process of preparing a funding proposal for hiv-aids-care.net, and have already received indications of a favourable response from charitable foundations and from within the information technology industry. I am also at a critical point in preparing a presentation and materials for a key two day planning meeting of NGOs and New York City groups working with HIV/AIDS on April 6 & 7. I am attaching a copy of the initial home page of the hiv-aids-care.net home page - and a representative page from the ffd-forum.net site (see below) - so that the Court can have in its possession evidence that corroborates the information submitted in this Affidavit. Another major project for which I have responsibility involves administering the Financing for Development Forum - FfD Forum - as a structure to enable broad-based, informed dialogue in preparations for an upcoming International Conference on Financing for Development that will be held in Mexico, tentatively in the spring of 2002. There is a critical Preparatory Committee meeting - negotiation session - that will take place in early May at UN Headquarters, in which the FfD Forum can play a critical role - in terms of developing a systematic framework for organizing and making available relevant documents and information and designing a structure to assist with the negotiation process - using methodologies of a parallel design to that conceived for the proposed information systems for this Housing Court - and in focusing attention on the critical importance of, and opportunities for, financing for development in the new knowledge-based economies in the context of this Conference - and, *inter alia*, through hosting a series of Roundtable Dialogues, two of which have been held to date at the UN with the support of the Permanent Mission of Egypt to the UN. There appear to be a growing number of representatives of UN Member States who share the concern that this is a vital - even perhaps the most important - issue to address in the Conference given the extent and manner in which information technologies have been transforming the nature and face of almost all aspects of finance and business, and given the broader context of a transition to a global knowledge-based economy - a transition that was recognized by the UN Economic and Social Council (ECOSOC) as the priority theme for the High-level segment of ECOSOC 2000 and of a related Ministerial Declaration. The Financing for Development Conference is widely seen by developing country representatives as the UN as an exceptionally important conference; at regional hearings for the Conference in Latin America last Fall, a U.S. representative stated that it is the most important of the series of global conferences that have taken place at the UN in the past decade. Meanwhile, as the NGO that has pioneered the use of information and communications technologies by NGOs involved in the 1992 Earth Summit, and the follow-up to the summit. Information Habitat is also engaged in

preparation for a major presentation in conjunction with the year's Session of the Commission on Sustainable Development - to be held for two weeks in April 2001, also at UN Headquarters - which will include a major focus on information for decision-making - and with a subsequent one-week Preparatory Committee for the ten year review of the 1992 Earth Summit - to be held next year in Johannesburg, South Africa.

Finally, in terms of the projects on the immediate horizon, Information Habitat is poised to play a key role in the preparations for the Istanbul+ 5 review of the Habitat Agenda, in June 2001, also at UN Headquarters; this presentation will involve a comprehensive report on the many initiatives - under the broad heading of a "Case Study in Information Ecology and Human Settlements" - that have been created under the auspices of the Habitat Partners Network and the Habitat Online Partnership Plan of Action that have been developed and facilitated by Information Habitat. I would be happy to provide evidence of these initiatives, should (cont. page 7)

Page	7	Date:	2001	03	30
			уууу	mm	dd
In	dex i	No. LT	70826/00)	

Index No. LT **70826/00**

 the Court require it, however, <i>I</i> am hesitant to burden this Court with any additional documents to revior of this information will be made available very shortly on Information Habitat's World Wide Web site a http://one-light.net. Meanwhile, as fate would have it and through the assistance of a good friend and neighbour, we have vere recently learned of - and have seen for the first time less than a week ago - a vacant house in our immediate neighbourhood that has been unoccupied for ten years or more and that appears to be structurally soun although in need of some repairs - mostly plumbing, re-wiring, some sheetrock installation and painting occupancy. We are cautiously optimistic that we will be able to make arrangements to occupy the house responsibility for its renovation. The building - and an adjoining one that is in need of more substantial improvements, including some structural repair - is owned by an Order of Catholic nuns, and we are prepreliminary proposal to initiate exploratory negotiations. Provided that we do not encounter any signific output to be building that he building that we might be able to each a mutually accent. 	
recently learned of - and have seen for the first time less than a week ago - a vacant house in our immed neighbourhood that has been unoccupied for ten years or more and that appears to be structurally soun although in need of some repairs - mostly plumbing, re-wiring, some sheetrock installation and painting occupancy. We are cautiously optimistic that we will be able to make arrangements to occupy the house responsibility for its renovation. The building - and an adjoining one that is in need of more substantial improvements, including some structural repair - is owned by an Order of Catholic nuns, and we are pre- preliminary proposal to initiate exploratory negotiations. Provided that we do not encounter any signific	
obstacles, it is not unreasonable to believe that believe that we might be able to each a mutually-accepts agreement - and to make the requisite repairs - in time for occupancy by the end of June 2001 - at which would be happy to vacate the premises. We note too that a June 30 deadline should also give the Petitic adequate time to make the requisite repairs to the premises that are called for in the Stipulations of Sett Given the magnitude and importance of these commitments - as well as to other ongoing commitments neighborhood level - e.g. Christine Fye is serving as Secretary of the Board of Neighborhood Women's Renaissance, a low-income community-based housing complex at a former hospital on Kingsland Avenu Respondents respectfully request that the Court take into consideration the above circumstances and a Decision and Order to set a date no earlier than June 30 2001 for Respondents to vacate the premises.	liate d, - before e and take eparing a ant able h point we oner clement. at a at a
In its Decision and Order of March 13, the Court did not cite any emergency conditions pertaining to t that might reasonably call for the virtually immediate execution of the warrant, nor was the time - almo months - that the Court took to issue its Decision and Order indicative of an emergency in this case. Per attorney has not submitted any claim to the Court that additional delay in resolving this case would cre- particular hardship for Petitioner, or that Petitioner's immediate or future welfare is in any jeopardy as a the case; indeed the lack of evidence of any hardship on Petitioner's behalf is also corroborated - as doc in Section 4, page 2, of this Affidavit - by the fact that Petitioner has made no request or demand for an from Respondents for the use of the premises and has not taken the trouble to make the repairs called for Stipulation that would legitimize a request for rent by the Landlord.	st six etitioner's ate any result of umented ay rent