

EXHIBIT 4

From: Dhinsa, Saarah (LAW) <sadhinsa@law.nyc.gov>
Sent: Tuesday, 07 July 2026 12:54:21
To: Andrew Carboy <acarboy@carboylaw.com>
Cc: Matthew McCauley <mmccauley@thmlp.com>
Subject: Re: [EXTERNAL] Re: DellaFiora deposition and Discovery responses Follow up

Hi Andrew,

As the OSC sets forth, we are seeking court supervision for Ms. Dellafiore's deposition as well. We will proceed after a determination by the Court on our application.

Best,
Sarah

From: Andrew Carboy <acarboy@carboylaw.com>
Sent: Tuesday, July 7, 2026 10:52 AM
To: Dhinsa, Saarah (LAW) <sadhinsa@law.nyc.gov>
Cc: Matthew McCauley <mmccauley@thmlp.com>
Subject: Re: [EXTERNAL] Re: DellaFiora deposition and Discovery responses Follow up

Please confirm that you are canceling DellaFiora. We see the motion the Law Department filed, but there is no return date. The DEP did not ask for a stay of DellaFiora deposition. Seeking clarity.

Law Offices of Andrew J. Carboy LLC
One Liberty Plaza, Floor 23
New York, NY 10006
212 520 7565

From: Dhinsa, Saarah (LAW) <sadhinsa@law.nyc.gov>
Sent: Monday, 06 July 2026 12:25:14
To: Andrew Carboy <acarboy@carboylaw.com>
Cc: Matthew McCauley <mmccauley@thmlp.com>
Subject: RE: [EXTERNAL] Re: DellaFiora deposition and Discovery responses Follow up

Good afternoon Andrew,

We are filing an OSC today for court supervision for both the continued deposition of Mr. Pecunies and the deposition of Ms. Dellafiore.

Best,
Sarah

From: Andrew Carboy <acarboy@carboylaw.com>
Sent: Sunday, July 5, 2026 10:07 PM
To: Dhinsa, Saarah (LAW) <sadhinsa@law.nyc.gov>

Cc: Matthew McCauley <mmccauley@thmlp.com>

Subject: [EXTERNAL] Re: DellaFiora deposition and Discovery responses Follow up

CAUTION! EXTERNAL SENDER. Never click on links or open attachments if sender is unknown, and never provide user ID or password. If **suspicious**, report this email by hitting the **Phish Alert Button**. If the button is unavailable or you are on a mobile device, forward as an attachment to phish@oti.nyc.gov.

Saarah, we will be seeking immediate court intervention unless we hear from you by tomorrow, July 6, at noon.

The City is defying a Court order for discovery in not responding to the Notice for D&I. The City ignored the existence of the notice and didn't even serve timely objections. Any objections are now waived.

Contrary to what your colleague advised, after you went to get her to address my question about outstanding responses, responsive documents, like emails, do exist per the testimony of Russell Pecunies.

We still don't know the identity of the record searchers, although we requested documents with that information.

We don't have confirmation that DellaFiora is being produced on July 8 for her deposition.

And the City is cloaking the factual details of the FOIL search and appeal behind attorney client privilege, blocking deposition questions and, apparently, paper disclosure, improperly.

For the record, the City lost this Article 78 because of its lack of transparency, violation of public records laws, and arbitrary and capricious conduct. We see little evidence that anything has changed. Please reevaluate and adjust the City's current positions, and provide us with complete Court ordered disclosure, including depositions and paper discovery. Why, after Mayor Mamdani's announcement last week concerning the September 11th archive, is the City again forcing the public to "fight for information that should have been theirs from the very beginning"?

Andrew Carboy

Law Offices of Andrew J. Carboy LLC
One Liberty Plaza, Floor 23
New York, NY 10006
212 520 7565

From: Andrew Carboy <acarboy@carboylaw.com>
Sent: Friday, 03 July 2026 11:16:19
To: Dhinsa, Saarah (LAW) <sadhinsa@law.nyc.gov>
Cc: Matthew McCauley <mmccauley@thmlp.com>
Subject: Re: DellaFiora deposition and Discovery responses Follow up

Saarah, following up. What are Respondent's positions concerning the questions we sent your office, two days ago, about Court-ordered discovery and the DellaFiora deposition? Thanks.

Law Offices of Andrew J. Carboy LLC
One Liberty Plaza, Floor 23
New York, NY 10006
212 520 7565

From: Andrew Carboy <acarboy@carboylaw.com>
Sent: Wednesday, July 1, 2026 8:35:18 PM
To: Dhinsa, Saarah (LAW) <sadhinsa@law.nyc.gov>
Cc: Matthew McCauley <mmccauley@thmlp.com>
Subject: DellaFiora deposition and Discovery responses

When can we expect responses to the discovery notice? It was returnable before today's deposition. We were advised by your colleague that there were no responsive documents to be had. The witness testified otherwise. There are other requested records that have not been addressed. Also, are you producing DellaFiora on 7.8? Thanks

Law Offices of Andrew J. Carboy LLC
One Liberty Plaza, Floor 23
New York, NY 10006
212 520 7565