

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

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BENJAMIN CHEVAT,

Petitioner,

-against-

THE CITY OF NEW YORK: OFFICE OF THE MAYOR,
NEW YORK CITY LAW DEPARTMENT and
NEW YORK CITY DEPARTMENT OF DESIGN and
CONSTRUCTION,

**AFFIRMATION
PURSUANT TO CPLR
2106 OF STEFAN
MOOKLAL IN
SUPPORT OF THE
CROSS-MOTION TO
DISMISS THE
VERIFIED PETITION**

Respondents.

Index No. 153916/2026

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I, STEFAN MOOKLAL, an attorney admitted to practice in New York State, affirm this 30th day of June, 2026, under the penalties of perjury under the laws of the State of New York, which may include a fine or imprisonment, that the following is true, and I understand that this document may be filed in an action or proceeding in a court of law.

1. I am the Chief of Privacy and Records in the New York City Law Department (hereinafter, “Respondent” or “Law Department”). In my position, I am responsible for reviewing the Law Department’s responses to Freedom of Information Law (“FOIL”) requests in appeals brought by members of the public, to the extent required by the Freedom of Information Law.

2. The statements in this affirmation are based on my personal knowledge and upon information provided to me by other employees of the Law Department and contained in the records of the Law Department.

3. When the Law Department initially conducted its search for records responsive to Petitioner's FOIL request, it identified nearly twenty Relativity workspaces containing records related to the September 11, 2001 attacks.

4. These Relativity workspaces contain voluminous amounts of records from many different City agencies and employees on a wide range of topics and issues.

5. The identified Relativity workspaces are not organized in a way such that records that are potentially responsive to Petitioner's requests would necessarily be within any particular workspace or location.

6. This prompted the Law Department to deny Petitioner's request.

7. Following the denial of Petitioner's request, the City began a project to explore their ability to publish any records related to the September 11, 2001 attacks to a public portal.

8. As it is likely that any records responsive to Petitioner's request would be included in this effort, the Law Department remanded Petitioner's appeal.

Stefan Mooklal

STEFAN MOOKLAL