

# PREMIER INVESTIGATIONS

FOI#15284

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Port Authority of New York & New Jersey  
225 Park Avenue South – 17<sup>th</sup> Floor  
New York, NY 10003

September 3<sup>rd</sup>, 2014

ATTN: Daniel Duffy/FOIL UNIT

Re: Fernandez, Maria v T&T Industry, Inc. & Piccinonno  
Date of Loss: 4/28/11  
Accident location: Entrance/Roadway to Holland Tunnel (Manhattan side)  
Premier File#: D-12823

Mr. Duffy,

I am an investigator working on behalf of the law offices of Edward Garfinkel and  
AIG Insurance. This law office, along with AIG represents T&T Industry, Inc. and driver  
Michael Piccinonno with regard to the lawsuit outlined above.

## F.O.I.L. REQUEST

**Please provide certified documentation for the installation and maintenance of the  
"Take turns merging" signs located along the entrance roadway to the Holland Tunnel  
(Manhattan side), including but not limited to permits, work orders, inspections, repairs,  
date of installation, etc.**

**Attached please find a photograph of the signs in question along with a map showing  
the area/accident location (these signs are located North of Watts Street/South of  
Broome Street). I have also included a copy of the Port Authority of NY/NJ Police  
accident report.**

Please contact me to advise of any additional information or fee required to comply with this  
request. I can be reached at (516) 359-6697. Thank you for your help with this matter.

Truly yours,

  
Marlon J. Weingrad  
Investigator

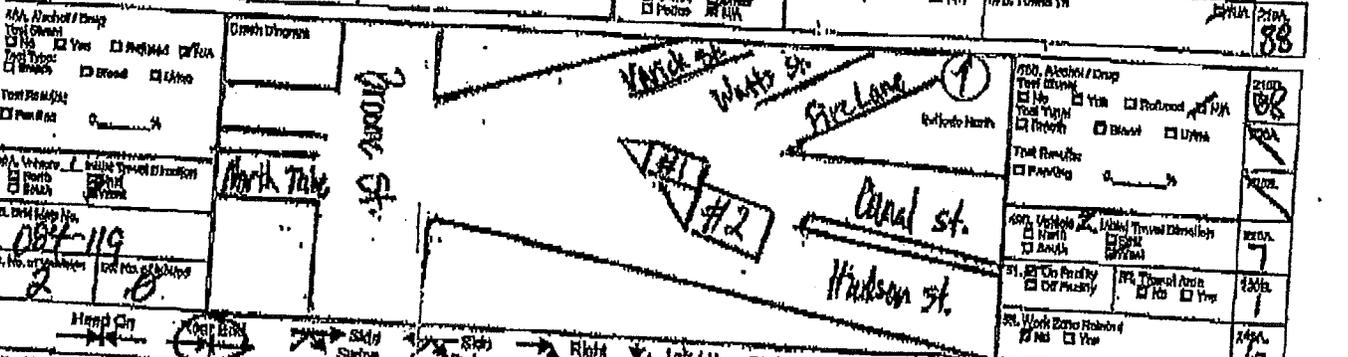
09-04-14P02:58 RCVD

**MOTOR VEHICLE CRASH REPORT**

THE FORTH AUTHORITY OF NY & NJ

PA0621 / 08-09

1. Motor Vehicle Crash No. <b>335-11</b>	2. Date of Crash <b>4/29/11</b>	3. Date of Report <b>4/29/11</b>	4. Facility <b>H-T</b>	5. Police Vehicle <b>None</b>	6. Police Department <b>H-T</b>	7. Reporting No. (Not for Public Use)	8. Page <b>1</b> of <b>2</b>	
9. Day of Week <b>Thursday</b>	10. Time of Day <b>2:50</b>	11. Absentee Report <input type="checkbox"/> No <input type="checkbox"/> Yes	12. Police <input type="checkbox"/> No <input type="checkbox"/> Yes	13. Insurance <input type="checkbox"/> No <input type="checkbox"/> Yes	14. PA Report/Documented <input type="checkbox"/> No <input type="checkbox"/> Yes	15. ACH <input type="checkbox"/> No <input type="checkbox"/> Yes	16. Reported Location <b>Canal St. Approach Holland Tunnel Newark, NJ</b>	
17. Name of Driver <b>ARRIVER</b>	18. Date of Birth <b>2/20/5</b>	19. Reported Other Description	20. Name of Driver <b>Maria T Fernandez</b>					21. Date of Birth <b>1/21</b>
22. Name of Driver <b>Maria T Fernandez</b>	23. Date of Birth <b>1/21</b>	24. Reported Other Description	25. Name of Driver <b>Michael F Piccinano</b>					26. Date of Birth <b>1/27</b>
27. Name of Driver <b>Ramon Perez</b>	28. Date of Birth <b>1/27</b>	29. Reported Other Description	30. Name of Driver <b>T+T Industry Inc</b>					31. Date of Birth <b>4/27</b>
32. Name of Driver <b>Ramon Perez</b>	33. Date of Birth <b>1/27</b>	34. Reported Other Description	35. Name of Driver <b>40 Redleaf Rd</b>					36. Date of Birth <b>11/23</b>
37. Name of Driver <b>Ramon Perez</b>	38. Date of Birth <b>1/27</b>	39. Reported Other Description	40. Name of Driver <b>Manhasset, NY 11030</b>					41. Date of Birth <b>11/23</b>
42. Name of Driver <b>Ramon Perez</b>	43. Date of Birth <b>1/27</b>	44. Reported Other Description	45. Name of Driver <b>14206 U.C. Blvd #32975</b>					46. Date of Birth <b>11/23</b>
47. Name of Driver <b>Ramon Perez</b>	48. Date of Birth <b>1/27</b>	49. Reported Other Description	50. Name of Driver <b>2006 Mack Dump</b>					51. Date of Birth <b>11/23</b>
52. Name of Driver <b>Ramon Perez</b>	53. Date of Birth <b>1/27</b>	54. Reported Other Description	55. Name of Driver <b>NATIONAL UNION FIRE</b>					56. Date of Birth <b>11/23</b>
57. Name of Driver <b>Ramon Perez</b>	58. Date of Birth <b>1/27</b>	59. Reported Other Description	60. Name of Driver <b>L.A. 0949301</b>					61. Date of Birth <b>11/23</b>



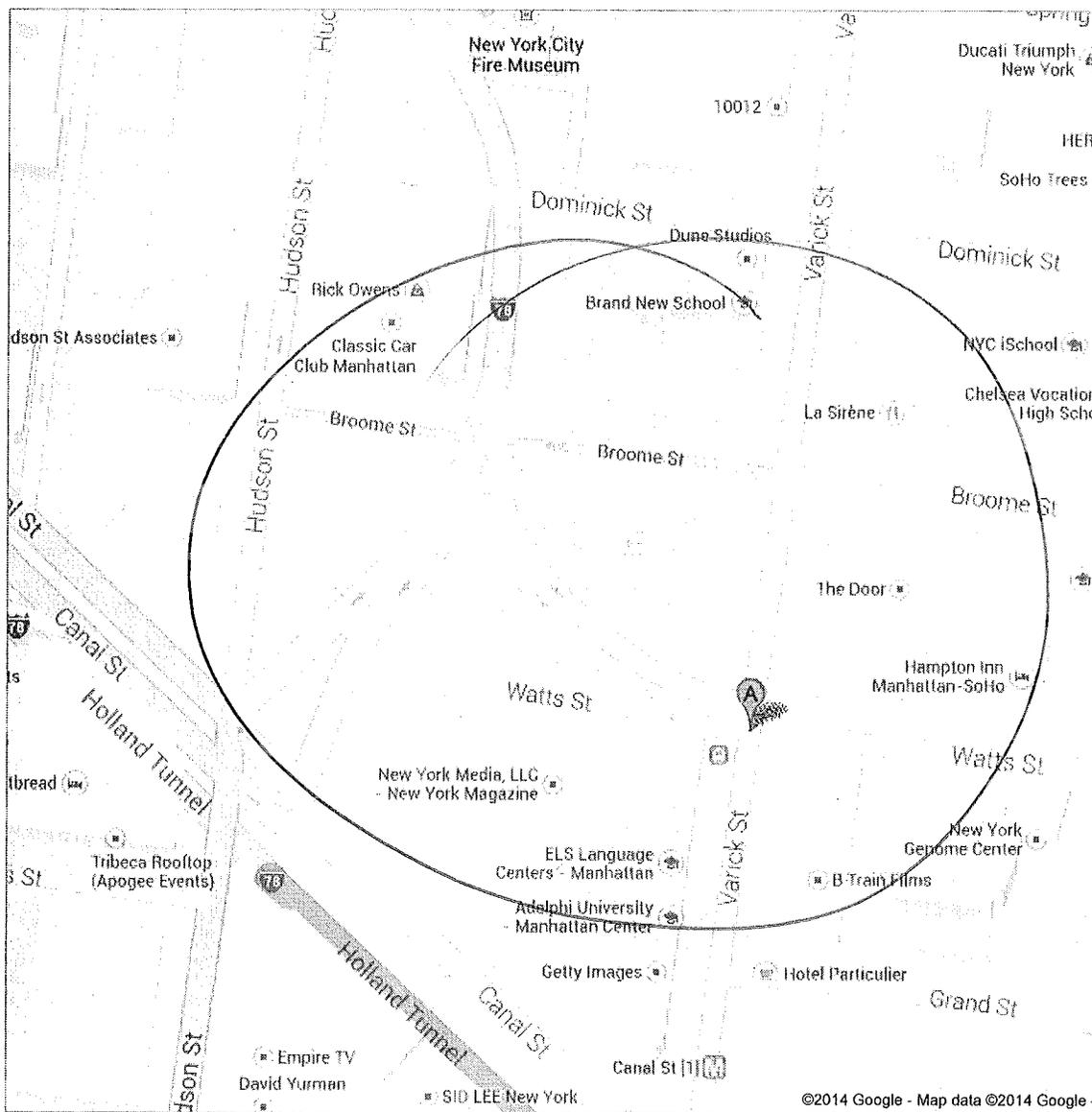
Driver of vehicle #1 stated as I was merging vehicle #2 struck the rear end of my vehicle. Driver of vehicle #2 stated it was my turn to merge in when vehicle #2 sped up in front of my vehicle causing us to collide.

Seq. No.	Age	Sex	Ok	Minor	Major	Other	Notes
1	39	F	1	5	F		Maria T Fernandez
2	49	M	1	3	M		Michael F Piccinano
3	17	M	1	3	M		Felix Fernandez





Address **Varick St & Watts St**  
**Varick St & Watts St**  
**New York, NY 10013**





**THE PORT AUTHORITY OF NY & NJ**

FOI Administrator

September 26, 2014

Mr. Marlon J. Weingrad  
Premier Investigations  
180 South Broadway  
White Plains, NY 10605

Re: Freedom of Information Reference No. 15284

Dear Mr. Weingrad:

This is a response to your September 3, 2014 request, which has been processed under the Port Authority's Freedom of Information Code, (the "Code", copy enclosed), for "Request for copies of certified documentation for the installation and maintenance of the "take turns merging" signs located along the entrance roadway to the Holland Tunnel (Manhattan side), including but not limited to permits, work orders, inspections, repairs, and date of installation."

Enclosed is the available material responsive to your request.

Please refer to the above FOI reference number in any future correspondence relating to your request.

Very truly yours,



Daniel D. Duffy  
FOI Administrator

Enclosure

**CERTIFICATION**

**DATE: September 10, 2014**

Name: Jose M. Rivera, Jr.  
Address: Two Gateway Center, 14<sup>th</sup> Floor, Newark, NJ 07102  
Employee #: 28770  
Date: September 10, 2014

RE: ***FOI REQUEST REFERENCE NO. 15284 - MARLON J. WEINGRAD (PREMIER INVESTIGATIONS)***  
**Request for copies of certified documentation for the installation and maintenance of the "take turns merging" signs located along the entrance roadway to the Holland Tunnel (Manhattan side), including but not limited to permits, work orders, inspections, repairs, and date of installation**

To Whom It May Concern:

I am the Chief Traffic Engineer at the Port Authority of New York and New Jersey in the Engineering Department. I have searched the files in response to above-referenced matter requesting documents pertaining to the traffic signs in question.

- I certify that the attached are the records in the possession of the Port Authority which are responsive to the above-referenced freedom of information request.
- I certify that we have searched our records and have found no documents available to comply with the request in the above-referenced freedom of information request.
- I certify that the records which would comply with the above-referenced freedom of information request have been destroyed pursuant to the Port Authority's Record Retention Policy.

Jose M. Rivera, Jr., P.E.  
**Name**

  
**Signature**

September 10, 2014  
**Date**

Port Authority of NY & NJ

**SIGN SERVICE REQUEST**

**THIS FORM (PA1821A) IS FOR USE BY TRAFFIC ENGINEERING STAFF ONLY  
(FACILITY AND LINE DEPARTMENT STAFF SHOULD USE FORM PA1821 TO REQUEST SIGNS, ETC.)**

SSR NUMBER  
**2008-0019**

FACILITY <b>HT</b>	DATE ORIGINATED <b>2/14/2008</b>	DATE REC'D BY T.E. <b>3/26/2008</b>	DATE REQUIRED <b>5/15/2008</b>	PR, A, B or C <b>C</b>	PRTY. & INIT. (FOR "C" ONLY) <b>PROY - A.L.</b>
TRAFFIC ENGINEER <b>Xiong Wu</b>	TITLE <b>Traffic Engineer</b>		PA TIE LINE & EXT. <b>04-7860</b>	OUTSIDE TEL. NO. <b>(973) 565-7860</b>	
FACILITY REQUESTOR (IF APPLICABLE) <b>Luis Franco</b>	TITLE <b>Traffic Engineer</b>		PA TIE LINE & EXT. <b>04-7837</b>	OUTSIDE TEL. NO. <b>(973) 565-7837</b>	
SPECIAL CHARGE CODE (IF APPLICABLE)					

Pursuant to the authority vested in me by the Executive Director by memorandum dated, June 23, 1963, I hereby authorize ~~this~~, these (installations, removals, changes in location, etc.) of (Signs, ~~Signs, Markings, etc.~~) as described below.

Date: 4/18/08 *FOR [Signature]*  
Chief Traffic Engineer

Describe Sign(s) or other Traffic Control Device(s) required. (Show location in sketch, including all pertinent details. If necessary, attach additional sheets.)

**HT NY side Approach / signs improvement**

**Instructions**

Location:  
NY side approach to HT as shown on sheet 3.

Fabricate:  
9 - 30"x30", Sign "A".  
9 - 24"x42", Sign "B"  
as shown on sheet 2.

Details: Use DG3 Sheeting to fabricate sign  
Apply Anti-Graffiti Coating *Installed 6/27/08*

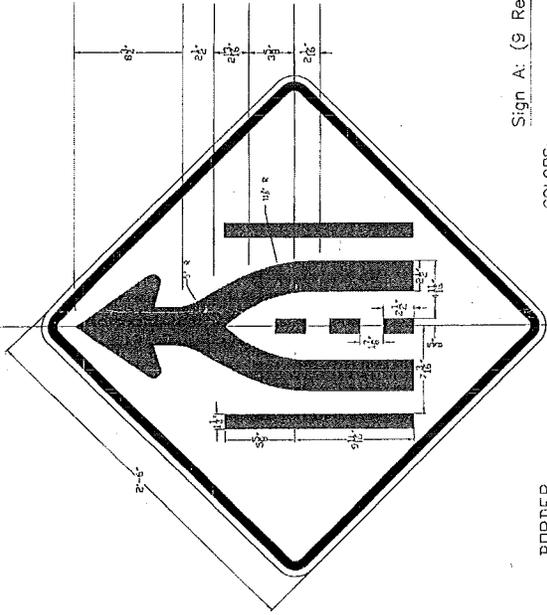
Remove:  
Remove existing signs as shown on sheets 3-5.

Install:  
Install all signs, See Sheets 3 -9

Total:  
Fabrication: 120 S.F. (18 Signs)  
Installation: 120 S.F. (18 Signs)  
Remove: 70 S.F. (10 Signs)

Tracking #: 07-021a Request #:

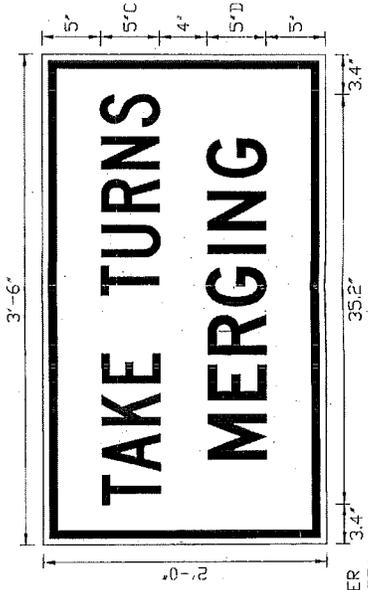
DATE RECEIVED	DATE COMPLETED	CREW LEADER	PRO	UNIT	ACT	JOB NUMBER
____/____/____	____/____/____		B2	420	134 135	700.329 703.329



Sign A: (9 Req.)

COLORS:  
 LEGEND -BLACK  
 BACKGROUND -YELLOW (REFLECTIVE)

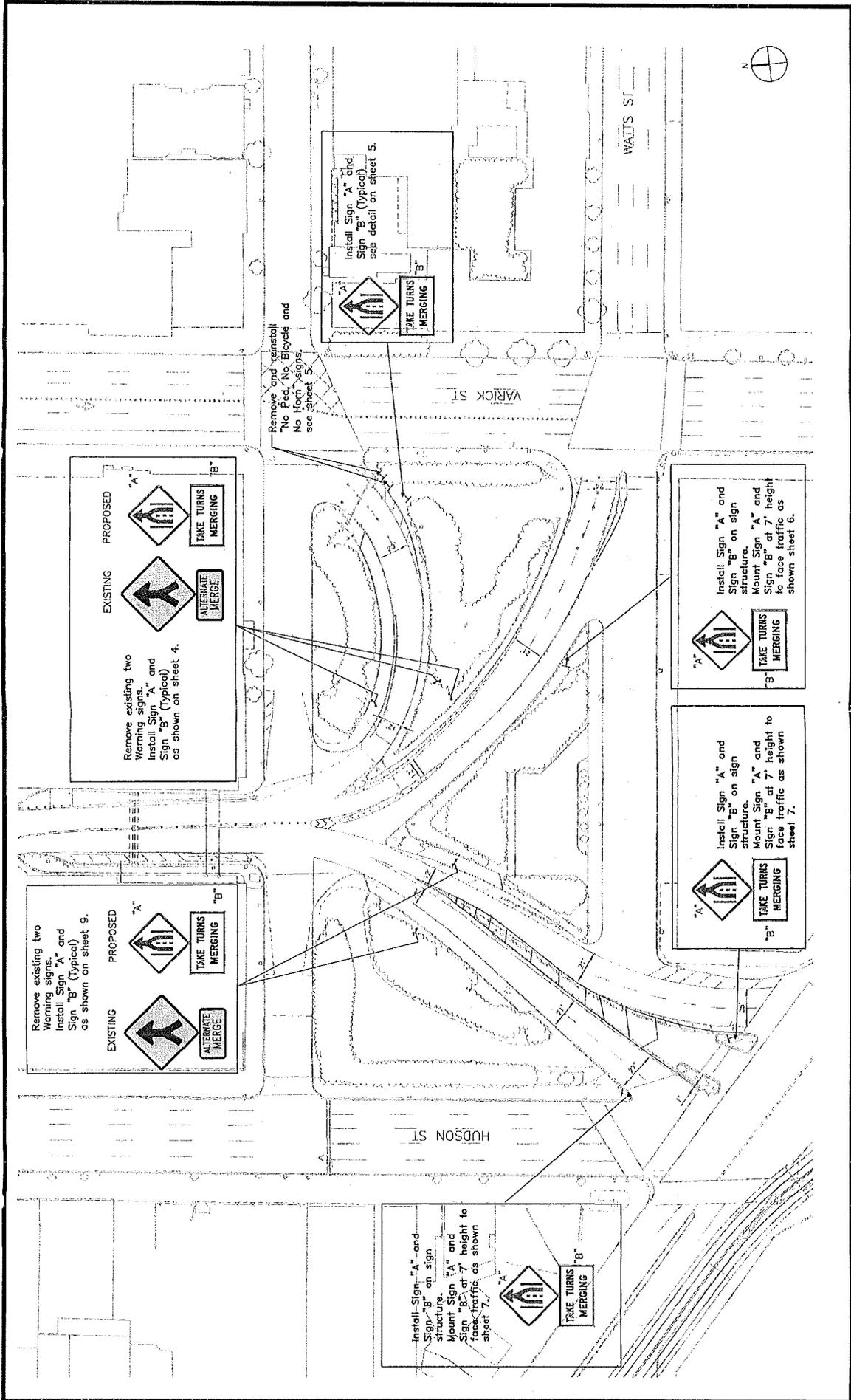
BORDER  
 R=1.37  
 TH=0.75  
 IN=0.5

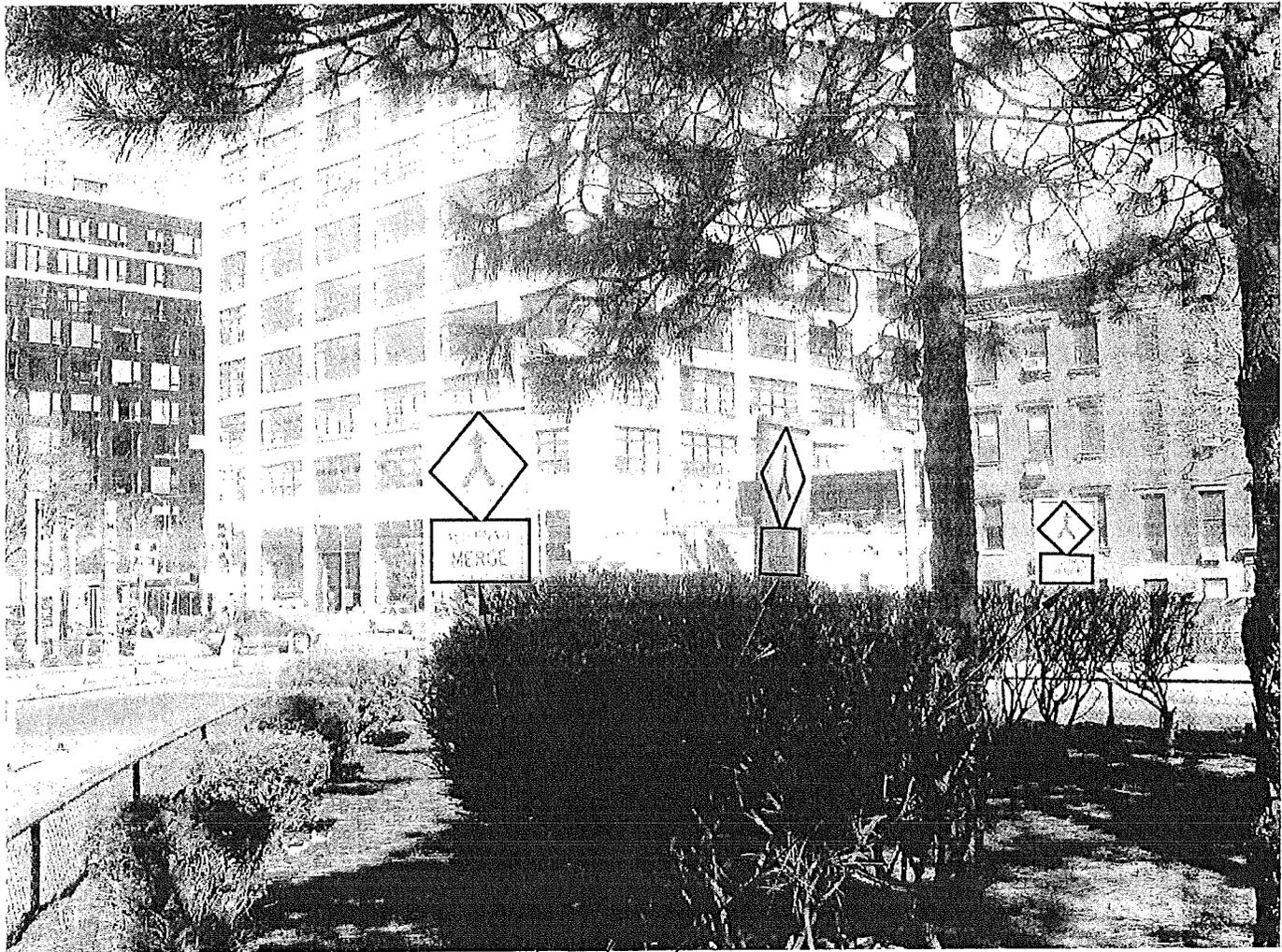


Sign B: (9 Req.)

COLORS:  
 LEGEND -BLACK  
 BACKGROUND -YELLOW (REFLECTIVE)

BORDER  
 TH=0.75  
 IN=0.5



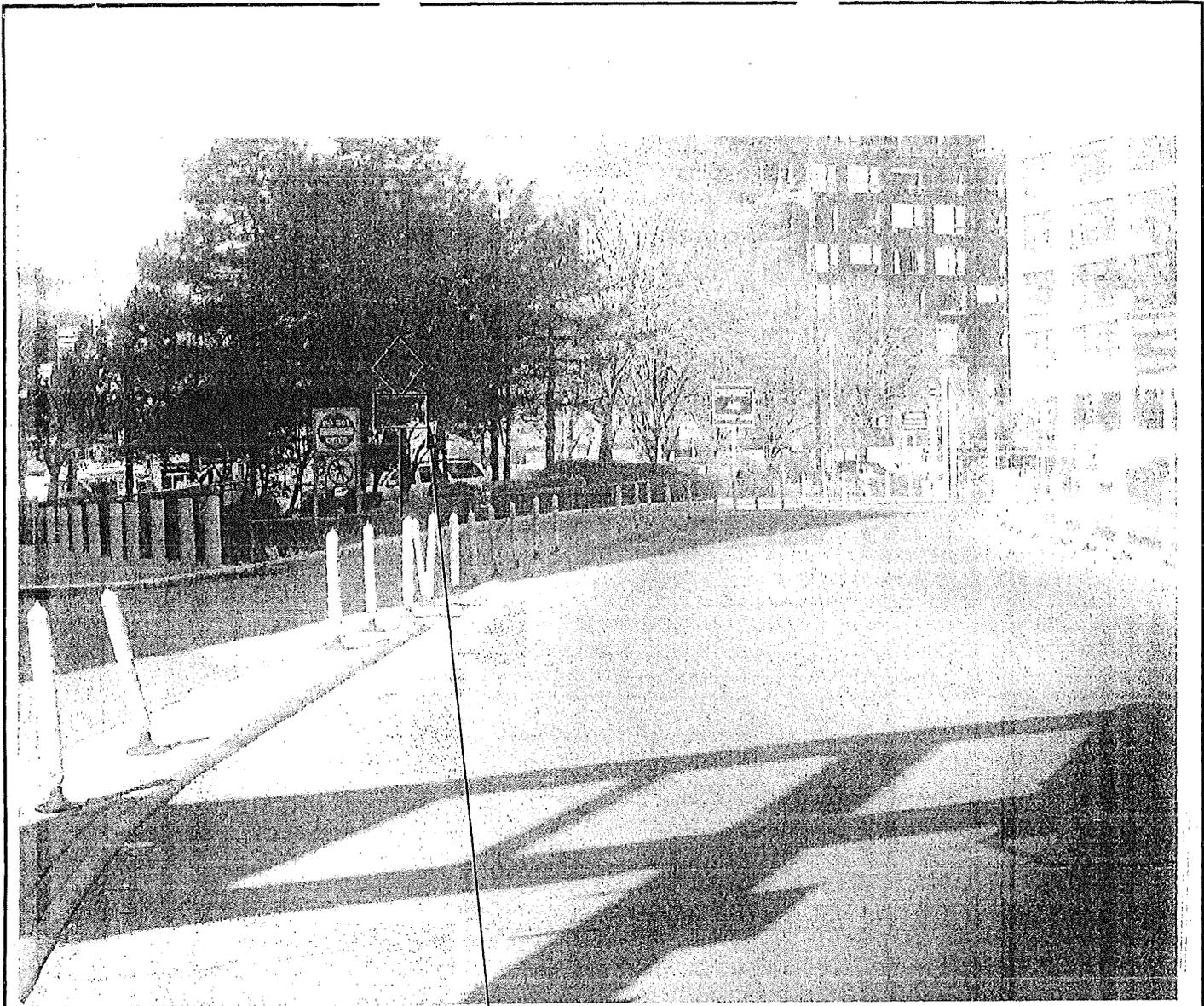


Remove existing  
warning signs.  
Install Sign "A" and  
Sign "B" at same  
location (Typical).  
See sheet 3.

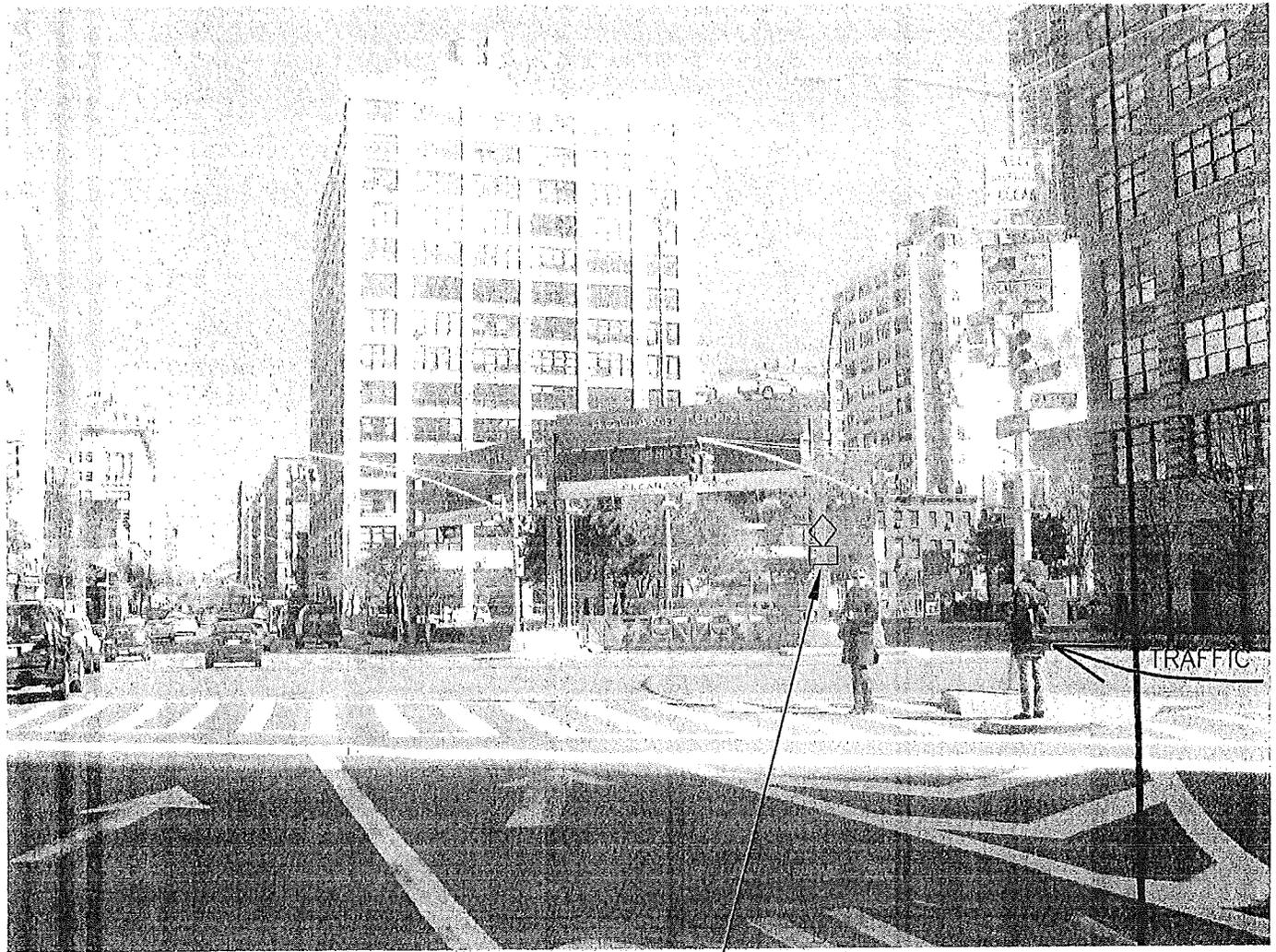


Relocate "No Ped,  
No Bicycle and No Horn" signs.  
Remove existing post.  
See sheet 3.

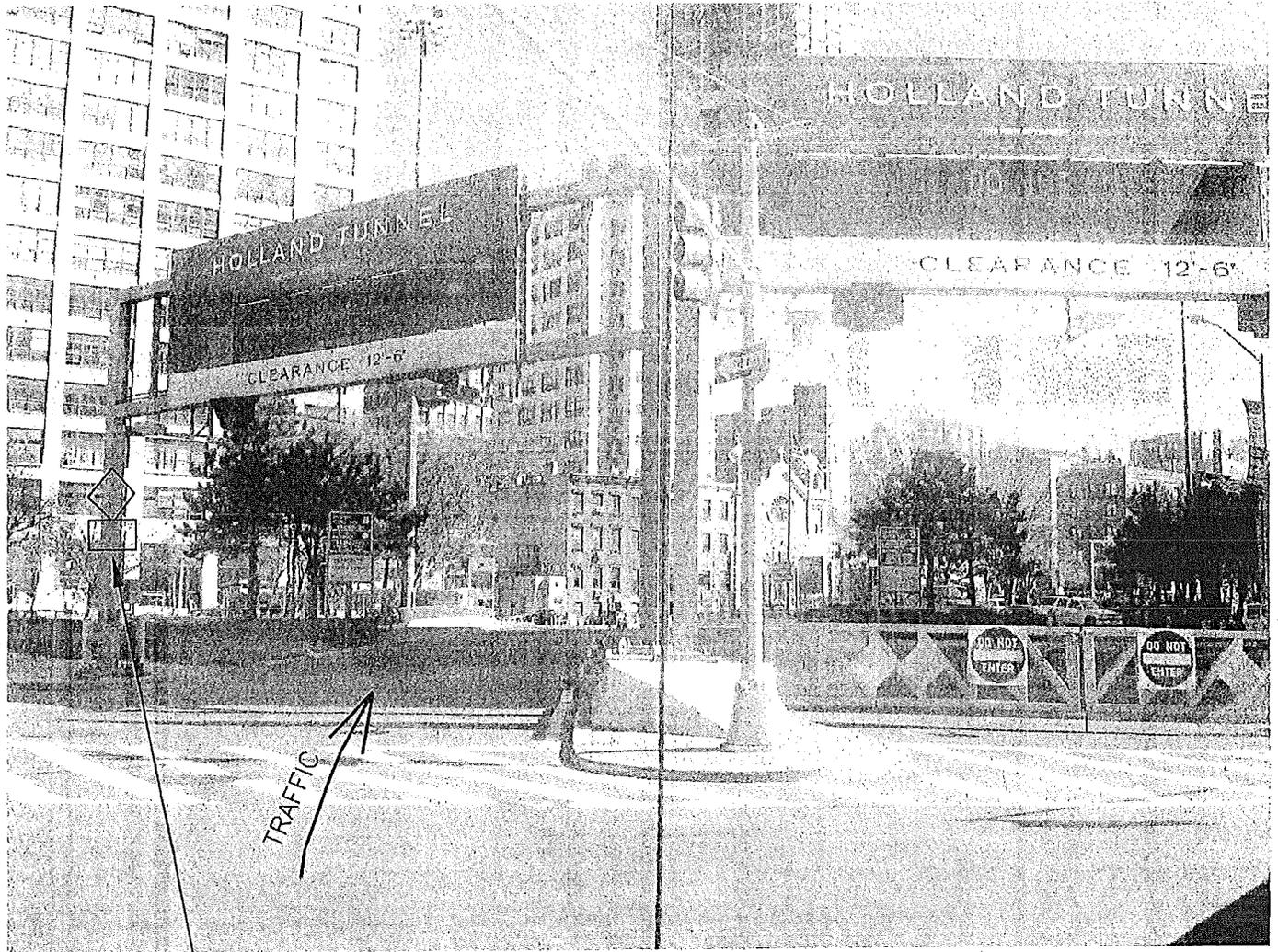
Install Sign "A" and  
Sign "B" on new post  
and face to traffic.  
See sheet 3.



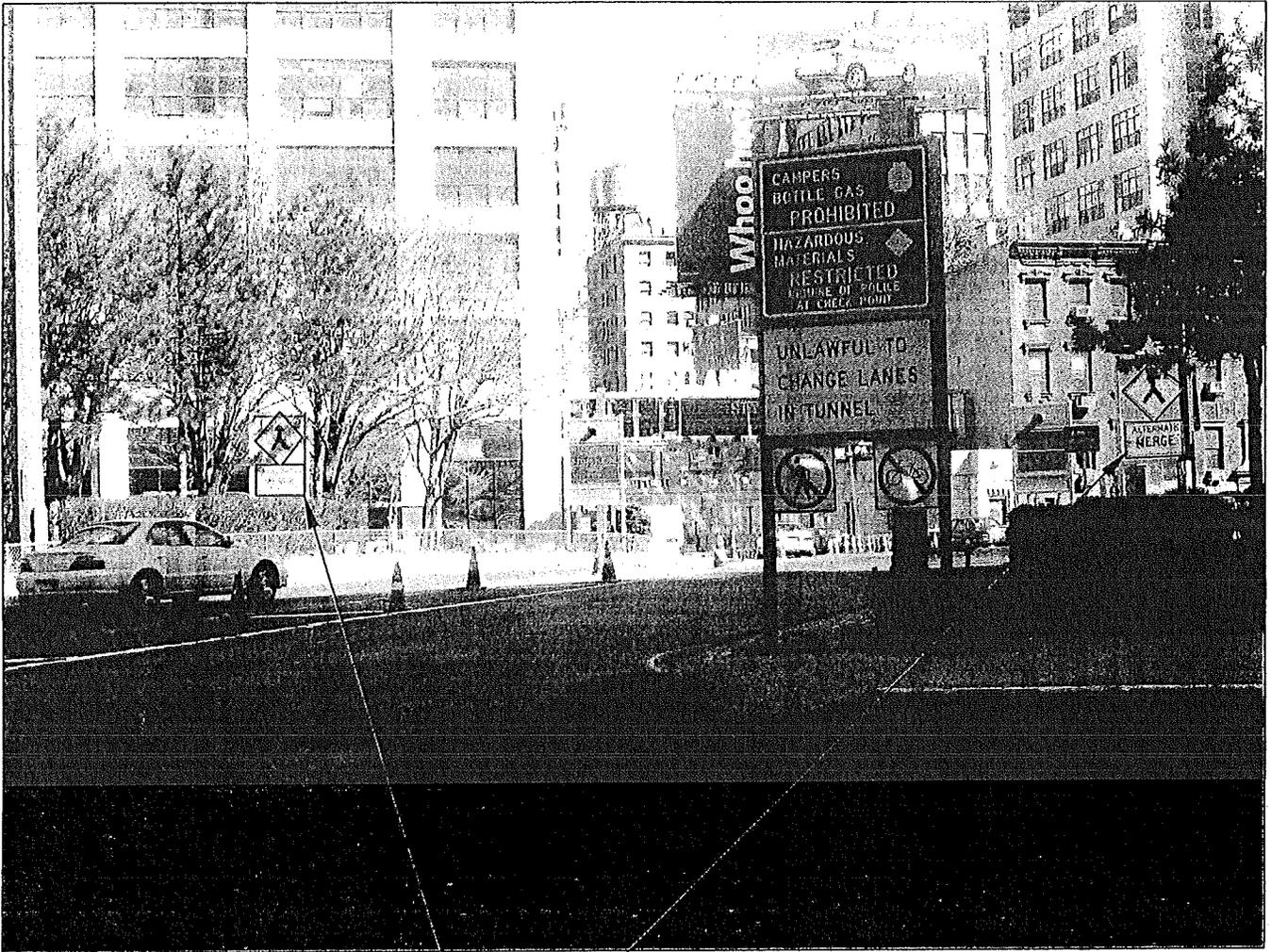
Install Sign "A" and  
Sign "B" on new post  
and face to traffic.  
See sheet 3.



Install Sign "A" and  
Sign "B" on sign structure.  
Mount Sign "A" and  
Sign "B" at 7' height and  
face to traffic.  
See sheet 3.



Install Sign "A" and  
Sign "B" on sign structure.  
Mount Sign "A" and  
Sign "B" at 7' height and  
face to traffic.  
See sheet 3.



Remove existing warning signs. Install Sign "A" and Sign "B" at same location (Typical). See sheet 3.

**SIGN SERVICE REQUEST**

THIS FORM (PA1821A) IS FOR USE BY TRAFFIC ENGINEERING STAFF ONLY  
(FACILITY AND LINE DEPARTMENT STAFF SHOULD USE FORM PA1821 TO REQUEST SIGNS, ETC.)

SSR NUMBER  
*2011-20*

FACILITY HT	DATE ORIGINATED 6/21/2011	DATE REC'D BY T.E. 6/21/2011	DATE REQUIRED 7/26/2011	PR,A,B or C B	PRTY.& INIT. (FOR "C" ONLY)
TRAFFIC ENGINEER Shabih, Raheel <i>(S/NK)</i>	TITLE Traffic Engineer		PA TIE LINE & EXT. _04-7841	OUTSIDE TEL. NO. (973) 565-7841	
FACILITY REQUESTOR (IF APPLICABLE)	TITLE		PA TIE LINE & EXT.	OUTSIDE TEL. NO.	
			SPECIAL CHARGE CODE (IF APPLICABLE)		

Pursuant to the authority vested in me by the Executive Director by memorandum dated, June 23, 1963, I hereby authorize the removal of the Sign(s) as described below.

Date: *8.11.11*

*POW [Signature]*  
Chief Traffic Engineer

*24*

Describe Sign(s) or other Traffic Control Device(s) required. (Show location in sketch, including all pertinent details. If necessary, attach additional sheets.)

HT-11-015 Remove merge warning sign and plaque

**Instructions**

Location:

11-015 - Remove merge warning sign and plaque at intersection of Canal Street and Hudson Street (see sheet 3).

Remove:

30" x 30" Merge Warning Sign (see sheets 3 and 4)  
24" x 42" "Take Turns Merging" Plaque (see sheets 3 and 4)

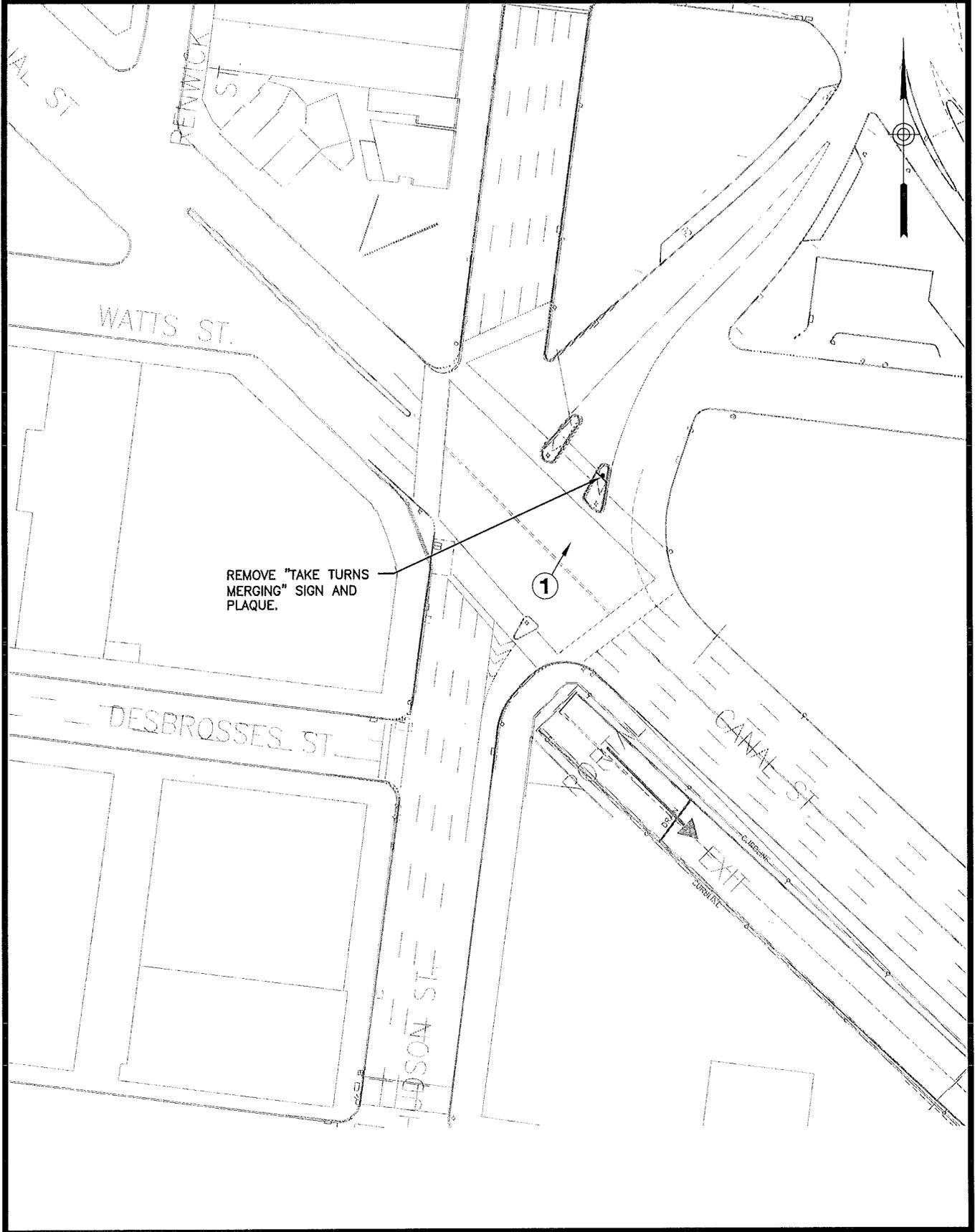
Totals:

Remove 13.25 SF of existing warning signs

Tracking Number: 7807

DATE RECEIVED ____/____/____	DATE COMPLETED ____/____/____	CREW LEADER	PRO B02	UNIT 420	ACT 135	JOB NUMBER 916.034
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REMOVE "TAKE TURNS MERGING" SIGN AND PLAQUE

**PHOTO 1**