

F01#15518

**EDELMAN & EDELMAN, P.C.**  
**ATTORNEYS AT LAW**  
**61 BROADWAY - SUITE 2220**  
**NEW YORK, NEW YORK 10006**  
**TELEPHONE: (212) 943-1200**  
**FACSIMILE: (212) 943-0001**

**MARTIN EDELMAN**  
**MYRON S. ROSEN**  
**DAVID M. SCHULLER**  
**PAUL H. MALONEY, IV**  
**HOWARD ENGLE**

**JEROME EDELMAN (1913-2000)**

November 12, 2014

**Via FedEx Express Overnight**

The Port Authority of New York and New Jersey  
Corporate Offices  
225 Park Avenue South  
New York, NY 10003  
&  
The Port Authority of New York and New Jersey  
Public Safety Department, MDA Unit  
241 Erie Street, Room 302  
Jersey City, NJ 07310

Attn: Officer Curtin - Shield# 2295

Re: Injured Party: John S. Conte  
Date and time of incident: 11/3/2014 at approximately 4pm  
Case No. 29236  
Location: JFK/BLDG77

11-24-14A11:31 RCVD

Dear Sir/Madam:

This law office represents John Conte. Mr. Conte was the victim of a motor vehicle accident which occurred on November 3, 2014 at approximate 4 p.m. in the parking lot in front of Building 77 (the T.N.T. side of lot) in John F. Kennedy Airport, Jamaica, New York 11430.

Mr. Conte is an employee of United States Custom and Border Protection. On the date and time stated, Mr. Conte was a pedestrian walking in this parking lot. He was struck by an orange and white colored van with the designation of TNT.com. The Port Authority Police responded to the scene, emergency personnel and an ambulance also responded to the scene.

We understand that there are security/surveillance cameras which include coverage of the location where the accident happened and also include coverage of nearby and adjacent areas, access roads and streets which would show where the van came from before the collision and where Mr. Conte came from.

EDELMAN & EDELMAN, P.C.

We request that all files and images of these cameras be preserved. We hereby put you on notice that an application will be filed in the appropriate court to demand the preservation and production of the files and images from these cameras.

Since you are now aware of the significance of these materials, please be advised that no portions of these digital files or images for this day are to be deleted, overwritten or erased.

We request that you now preserve these files and images pending the order of the Court.

Please be further advised that the subject files and images not only concern the happening of the accident, but also the images of investigation by Port Authority Police, the response, the emergency personnel and the ambulance response and potential witnesses.

We also request that the digital files and images for adjacent and nearby areas of the parking lot and access roads and entrances and exits be preserved so that we can determine where the vehicle which struck Mr. Conte came from, where it went and how long before the accident the vehicle was in the parking lot.

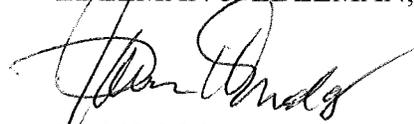
These files and images may be from more than one camera. We advise you, that the files and images for all such cameras be preserved.

I am quite sure that the court will agree with our position that all of this information is material and relevant to a complete and thorough investigation of this occurrence.

If your office believes that any materials in these digital files or images should remain confidential then I suggest that your position be raised by your attorneys in Court instead of any unilateral decision on your part to erase or delete these materials.

Thank you for your anticipated cooperation.

Very truly yours  
EDELMAN & EDELMAN, P.C.



Paul H. Maloney

VEHICLE CRASH REPORT

PA100217-00-01

1 Motor Vehicle Crash No. 29236	2 Date of Crash 11/03/14	3 Date Reported 11/03/14	4 Facility JFK/IA	<input checked="" type="checkbox"/> New York <input type="checkbox"/> New Jersey	5 Police Command JFK	Reference No. (Engineering Use)	Page 1 of 1
110 6 Day of Week 01 MON	7 Time (24 Hours) 1605	8 Appended Report <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	9 Photos <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	10 Reportably <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	11 PA Property Damaged <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	12 AGA <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	13 Detained Location Building 77 Front of Loading docks
14 Reporting Officer's Name (Print) CURTIN	15 Shield No. 2245	16 Reporting Officer's Signature <i>[Signature]</i>					
120 17 Supervising Officer's Name (Print) 01 Co. K. Hernandez	18 Shield No. 142	19 Supervising Officer's Signature <i>[Signature]</i>					
20A Driver (Pedestrian Name) (Circle one) from Driver's License CONTE, JOHNS		21A Sex No.	20B (Driver) Pedestrian Name (Circle one) from Driver's License GUZMAN, EDUARDO, R		21B Sex No. 1		
130 22A No. Street	22B No. Street						
23A City, State, Zip	23A Date of Birth	23B City, State, Zip		23C Date of Birth			
24A Lic. State	24A Driver's License No.	24A Exp. Date	24A AGA <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	25B Lic. State	25B Driver's License No.	25B Exp. Date	25B AGA <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
26A Driver's Name (from Registration) <input type="checkbox"/> Same as Driver		26B Driver's Name (from Registration) WHEELS LT		<input type="checkbox"/> Same as Driver			
26A No. Street		26B No. Street 666 GARLAND PLACE					
26A City, State, Zip		26B City, State, Zip DES PLAINES IL 60016					
27A Passengers	27A Vtr.	27B Passengers		27B VIN 1FTNE2EW3D0A56119			
28A Year	28A Make	28A Model	28A State	28A Plate No.	28B Year	28B Make	28B Model
28A Year 2010	28A Make FORD	28A Model VAN	28A State NO	28A Plate No. 70231JZ	28B Year	28B Make	28B Model
29A Insurance Carrier Name		29B Ins. Code		29C Insurance Carrier Name LIBERTY MUTUAL INS CO		29D Ins. No. 153	
29A Insurance Policy No.		29B Ins. Exp. Date		29C Insurance Policy No. A52631506100033		29D Ins. Exp. Date 12/31/14	
30A Damages other than Auto <input type="checkbox"/> None Issued <input type="checkbox"/> Issued		30B Location Code(s) <input type="checkbox"/> N/A		30C Suspension and Arrest No. <input checked="" type="checkbox"/> None Issued <input type="checkbox"/> Issued		30D Violator Code(s) <input type="checkbox"/> N/A	
31A Towed Authorized By <input type="checkbox"/> Owner <input type="checkbox"/> Driver <input type="checkbox"/> Police <input type="checkbox"/> N/A	31A Towed By	<input type="checkbox"/> N/A	31A Towed To	<input type="checkbox"/> N/A	31B Towed Authorized By <input type="checkbox"/> Owner <input type="checkbox"/> Driver <input checked="" type="checkbox"/> Police <input type="checkbox"/> N/A	31B Towed By	<input type="checkbox"/> N/A

32A Accident Drug Test Given <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Refused <input type="checkbox"/> N/A	Crash Diagram 	32B Alcohol Drug Test Given <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Refused <input type="checkbox"/> N/A
32A Test Type <input type="checkbox"/> Breath <input type="checkbox"/> Blood <input type="checkbox"/> Urine		32B Test Type <input type="checkbox"/> Breath <input type="checkbox"/> Blood <input type="checkbox"/> Urine
32A Test Results <input type="checkbox"/> Pending 0.____%		32B Test Results <input type="checkbox"/> Pending 0.____%
33A Vehicle Initial Travel Direction <input type="checkbox"/> North <input checked="" type="checkbox"/> East <input type="checkbox"/> South <input type="checkbox"/> West	33B Vehicle Initial Travel Direction <input type="checkbox"/> North <input checked="" type="checkbox"/> East <input type="checkbox"/> South <input type="checkbox"/> West	33C Vehicle Initial Travel Direction <input checked="" type="checkbox"/> On Facility <input type="checkbox"/> Off Facility
33A 33B Map No. 125-145	33C 33D 33E 33F 33G 33H 33I 33J 33K 33L 33M 33N 33O 33P 33Q 33R 33S 33T 33U 33V 33W 33X 33Y 33Z	33C 33D 33E 33F 33G 33H 33I 33J 33K 33L 33M 33N 33O 33P 33Q 33R 33S 33T 33U 33V 33W 33X 33Y 33Z
34A No. of Vehicles	34B No. of Injured	34C Work Zone Related <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes

35 Crash Description  
Pedestrian states he was exiting the building after work and was struck by the front of the vehicle causing injury. Driver of vehicle #1 states he was driving towards the loading bays and was temporarily blinded by the sun and said pedestrian stepped into the path of his vehicle.

57 Vch No.	58 Age	59 Pos.	60 Safety Device	61 Eject	62 Injury Severity	63 M/F	64 Injury Area	65 Taken By	66 Taken To	67 Name and Address of All Vehicle Occupants or Pedestrians (If Deceased, include Date & Time of Death)	68 Refused Medical
A 01	49	01	02	1	5	M		304	6639	GUZMAN, EDUARDO	<input type="checkbox"/> Refused Medical
B A	49					M	09			CONTE, JOHNS	<input type="checkbox"/> Refused Medical
C											<input type="checkbox"/> Refused Medical

**THE PORT AUTHORITY OF NY & NJ**

FOI Administrator

December 12, 2014

Mr. Paul H. Maloney  
Edelman & Edelman, P.C.  
61 Broadway  
New York, NY 10006

Re: Freedom of Information Reference No. 15518

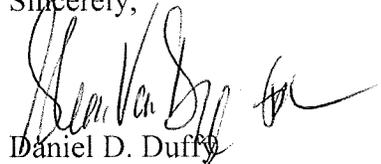
Dear Mr. Maloney:

This is a response to your November 12, 2014 request, which has been processed under the Port Authority's Freedom of Information Code, copy enclosed, for a copy of the security/surveillance cameras video related to John Conte's accident on November 3, 2014 at approximately 4 p.m. in the parking lot in front of Building 77 (the T.N.T. side of lot) in John F. Kennedy Airport.

Please be advised that we have searched our files and found no documents responsive to the request.

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

Sincerely,



Daniel D. Duffy  
FOI Administrator

Enclosure