

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK: HOUSING PART B

-----X  
THOMAS DUKLETH, ZACHARY HALL,  
SHIRAS PATTERSON BECKWITH, JUDY  
SABIN, AND REMIGIUSZ CHLAPEK  
*Petitioners,*

**Index No.:** LT-307504-25/NY

**(PROPOSED) NOTICE OF  
INSPECTION**

-against-

109E9 LLC, MICHAEL GEYLIK, MGNY  
CONSULTING CORP, YURI GEYLIK  
*Respondents,*

**Subject Premises:**  
109 East 9<sup>th</sup> Street  
New York, NY 10003

-and-

NYC DEPARTMENT OF HOUSING  
PRESERVATION & DEVELOPMENT and NYC  
DEPARTMENT OF BUILDINGS,  
*City-Respondents.*

-----X

PLEASE TAKE NOTICE that pursuant to CPLR R §§ 3120 (1)(ii) and 408, C, Tenant-Petitioners, by and through their attorneys TAKEROOT JUSTICE, hereby demand that Owner-Respondents allow for the following requested entry into the subject premises, within thirty (30) days of service of this notice.

**INSTRUCTIONS**

1. If you cannot comply with this request in full, after exercising due diligence, please so state, specifying all reasons why you are unable, or unwilling to comply.
2. All communications related to arranging the demanded entry for inspection will be made to Tenant-Petitioners' counsel by email to: [jakchin@takerootjustice.org](mailto:jakchin@takerootjustice.org)

## **DEFINITIONS**

1. “Owner-Respondents” shall mean Owner-Respondents in this action: 109E9 LLC, MICHAEL GEYLIK, MGNV CONSULTING CORP, YURI GEYLIK
2. “Subject premises” shall mean 109 East 9th Street, Manhattan, NY 10003, including without limitation the entirety of New York Block 555, Lot 40, and any buildings and appurtenances thereon.
3. “Tenant-Petitioners’ counsel” shall mean all representatives from TakeRoot Justice or any of their employees, agents, or contractors.

## **DEMAND FOR ENTRY FOR PUPOSE OF INSPECTION**

Owner-Respondents shall allow entry to Tenant-Petitioners’ counsel and any experts retained by Tenant-Petitioners, including removing any fastening devices or locks required to gain admission, to the following spaces within or around the subject premises:

(1) The following dwelling units located on floors 2-5 of 109 East 9<sup>th</sup> Street:

- a. 1A, 1B, 1C (combined 2<sup>nd</sup> floor residential unit)
- b. 2A
- c. 2C
- d. 3A
- e. 3B (formerly common area kitchen)
- f. 4A
- g. 4C

(2) The following common areas located within 109 E. 9<sup>th</sup> Street:

- a. 2<sup>nd</sup> story water closet;

- b. 3<sup>rd</sup> story former water closet (between 2A and 2B);
- c. 4<sup>th</sup> story former kitchen (a/k/a 3B);
- d. 4<sup>th</sup> story former bathing facilities;
- e. 5<sup>th</sup> story water closet.

(3) All common area hallways and stairwells on or between stories 2-5 at 109 East 9<sup>th</sup> Street.

(4) The roof of 109 East 9<sup>th</sup> Street.

(5) The rear yard at 109 East 9<sup>th</sup> Street.

The entry for the purposes of inspection, photographing, and measurement will be made on the \_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_\_ o'clock or at such date and time that is feasible for Tenant-Petitioners' counsel and retained experts.

Dated: July 11, 2025  
Queens, New York



**TAKEROOT JUSTICE**  
*Attorneys for Petitioners*  
By: Jennifer Akchin  
123 William St., Suite 401  
New York, New York 10038  
Tel: (929)-506-0310