

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

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

Index No.: LT-307504-25/NY

-against-

**(PROPOSED) NOTICE TO
PRODUCE**

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

Subject Premises:
109 East 9th Street
New York, NY 10003

-and-

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

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PLEASE TAKE NOTICE, that pursuant to CPLR § 3101 *et seq.*, Tenant-Petitioners, by and through their attorneys TAKEROOT JUSTICE, hereby demand that Owner-Respondents 109E9 LLC, MICHAEL GEYLIK, MGNY CONSULTING CORP, and YURI GEYLIK produce for inspection and copying the documents described below, within thirty (30) days of service of this notice.

INSTRUCTIONS

1. Each request for discovery and inspection seeks production of all documents described, along with any attachments, drafts or non-identical copies.
2. These demands are continuing in nature, and Owner-Respondents are obligated to promptly amend or supplement any responses to these demands upon becoming aware of

or receiving new information or information that indicates any prior response is inaccurate, incomplete, or misleading.

3. All documents shall be produced in digital format. All documents not already in digital format shall be scanned into Portable Document Format (“PDF”) or otherwise rendered into a digital format.
4. All documents shall be provided to Respondent’s counsel by email to the following address: jakchin@takerootjustice.org
5. For each document that is withheld in its entirety for any reason, an accompanying explanation of the alleged justification for such withholding, specific to such document, shall be provided.
6. For each document which is redacted in any manner, including any obscuration or excerption, an accompanying explanation of the alleged justification for such redaction, specific to each such redaction, shall be provided; and all such redactions shall be limited only to the specific material to which such alleged justification applies.

DEFINITIONS

The following definitions are application to the demands contained herein:

1. “Any” shall be construed to encompass the terms “every” and “all.”
2. “And/Or” shall be constructed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
3. “Communication” shall mean the transmittal of information (in the form of facts, ideas, inquiries or otherwise), whether orally, electronically, in writing, or in any other manner, at any time or place, and under any circumstances whatsoever.

4. "Document" shall mean: (i) any material, whether typed, handwritten, printed, taped or otherwise recorded; (ii) all tangible things from which information can be processed or transcribed; (iii) notes reflecting telephone conversations; (iv) email; (v) texts; and (vi) electronically stored information ("ESI"). The term is intended to encompass that which is in final, as well as in draft or other non-final form; that which was sent, received, or neither sent nor received; that which is and is not known by Petitioner to still be in existence. The term is intended to include, but not be limited to the original; a copy (if the original is not available); any non-identical copy (which is different from the original because of underlining, editing marks, notes made on or attached to such copy, or otherwise); as well as all underlying, supporting preparatory material and drafts thereof.
5. "Owner-Respondents" shall mean Owner-Respondents in this action: 109E9 LLC, MICHAEL GEYLIK, MGNV CONSULTING CORP, YURI GEYLIK
6. "Records" shall mean any written or recorded material of any kind, including but not limited to: agreements, contracts, leases, addenda, amendments, letters, correspondence, photographs, videotapes, memoranda, notes, telegrams, pamphlets, reports, ledgers, documents, vouchers, checks, invoices, studies, books, working papers, diaries, charts, papers, flow charts, program specifications, time cards, drawings, sketches, graphs, indices, data sheets, data processing cards, computer tapes, diskettes, or printouts, sound recordings, records of telephone or other conversations or meetings, telegrams, telex messages, inter-office conversations, and any writings however produced or reproduced, including any non-identical draft or copy thereof.

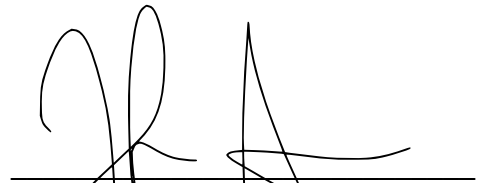
7. "Subject premises" shall mean 109 East 9 Street, Manhattan, NY 10003, including without limitation the entirety of New York Block 555, Lot 40, and any buildings and appurtenances thereon.
8. "Tenant-Petitioners' counsel" shall mean all representatives from TakeRoot Justice or any of their employees, agents, or contractors.
9. "Vacant apartments" shall mean any and all units in the subject premises that are currently without occupants, whether or not construction and/or renovations have occurred or are occurring in those units.

DEMAND FOR DOCUMENTS AND/OR RECORDS

1. Any communications, assessments, reports, evaluations, recommendations, plans, and/or other documentation prepared by Steel Core Engineering, or by any agent of Steel Core Engineering, and submitted to Owner-Respondents, their members, officers, or agents regarding repairs or modifications to the Subject Premises between June, 2021-present.
2. Any communications, assessments, reports, evaluations, recommendations, plans, and/or other documentation prepared by SM Tam Architect, or by any agent of SM Tam Architect and submitted to Owner-Respondents, their members, officers, or agents regarding repairs or modifications to the Subject Premises between June, 2021-present.
3. Any communications, assessments, reports, evaluations, recommendations, plans, and/or other documentation prepared by any other contractor and/or third party professional, and submitted to Owner-Respondents, their members, officers, or agents regarding repairs or modifications to the Subject Premises between June, 2021-present

4. Any contracts between Owner-Respondents, its members, officers, or agents and any contractors, laborers, and/or other third-party professionals regarding repairs or modifications to the Subject Premises between June, 2021-present.
5. Any communications between Owner-Respondents, their members, officers, agents, contracted architects or contracted professional engineers, and the Department of Buildings, or any employee thereof between June, 2021-present.

Dated: July 11, 2025
New York, New York



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