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October 27, 2021

BY HAND

Office of the City Clerk
City of New York
141 Worth Street
New York, NY 10013

BY E-MAIL

Land Use Division of the City Council
Att'n Julie M. Lubin, Esq., Counsel
250 Broadway, 16th Floor
New York, NY 10007
(jlubin@council.nyc.gov)

Re: Protests Against Applications by New York Blood Center, Inc.
(Applications Nos. N 210352 ZRM, C 210351 ZMM, C 210353 ZSM)

Dear Sirs or Madams:

This law firm represents New York Blood Center, Inc. ("NYBC"), which is the applicant on the above-referenced applications. The applications have been approved by the City Planning Commission and now are pending before the City Council.

We have learned that, in the last few days, protests against NYBC's applications have been filed with the Office of the City Clerk, ostensibly pursuant to § 200(a)(3) of the City Charter, by or on behalf of the Board of Managers of The 301 East 66th Street Condominium and various unit owners in that condominium, and by or on behalf of 333 East 66th Street Corp., which claims to be a cooperative apartment corporation.

We believe that these protests are defective and ineffective for multiple reasons, and we intend to submit an analysis supporting that position. Therefore, we request that no determination be made as to the validity of those protests until we have completed and submitted our analysis, which we will endeavor to do promptly.

Because of our uncertainty as to who will take responsibility for determining on behalf of the City the protests' validity, we are copying the Chiefs of the Law Department's Legal Counsel, Environmental and Administrative Law Divisions on this letter.

Office of the City Clerk

October 27, 2021



Thank you very much for your attention to this request.

Very truly yours,

A handwritten signature in blue ink, appearing to read "P. Selver", with a long horizontal flourish extending to the right.

Paul D. Selver
Partner

PDS:jlb

cc (by e-mail): Stephen Louis, Esq. (slouis@law.nyc.gov)
Hilary Meltzer, Esq. (hmeltzer@law.nyc.gov)
Sherrill Kurland, Esq. (skurland@law.nyc.gov)