

CITY COUNCIL  
CITY OF NEW YORK

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TRANSCRIPT OF THE MINUTES

Of the

SUBCOMMITTEE ON LANDMARKS, PUBLIC SITING AND  
MARITIME USES

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March 28, 2017  
Start: 11:48 a.m.  
Recess: 12:19 p.m.

HELD AT: 250 Broadway - Committee Rm.  
16th Fl

B E F O R E: PETER A. KOO  
Chairperson

COUNCIL MEMBERS: Annabel Palma  
Deborah L. Rose  
Rosie Mendez  
Stephen T. Levin  
Inez D. Barron  
Ben Kallos

## A P P E A R A N C E S (CONTINUED)

Lauren George, Director  
Intergovernmental and Community Affairs  
Landmarks Preservation Commission

Lisa Kersavage, Director  
Strategic Planning  
Landmarks Preservation Commission

Kate Lemos McHale, Director of Research  
Landmarks Preservation Commission

[background comments] [gavel]

CHAIRPERSON KOO: Good morning. I am Council Member Koo, Chair of the Subcommittee on Landmarks, Public Siting and Maritime Uses. We are joined by Council Members—I don't see the list here. Council Member Palma, Council Member Mendez, Council Member Levin, Council Member Rose and Council Member Barron. We are also joined by Council Member Perkins. Today we are holding a public hearing on LU 593 an application for a landmark designation by the Landmarks Preservation Commission of the United—of the United Nations First through—First Floor Interiors located at 1 and 2 United Nation's Plaza in Council Member Garodnick's district in Manhattan. The Council member is supportive of this designation and we expect to vote on it at the conclusion of today's public hearing. We will be also voting on four applications for landmark designations that were laid over from our February 27 and March 9 hearings. These four applications are the last of LPC's Backlog Initiative Designations. These items are as follows—the Backlog Initiative items are as follows: I'm sorry.

1  
2           The first item is LU 579 the Young Men's  
3 Christian Association Building know as the Jackie  
4 Robinson YMCA Youth Center locate at 181 West 135th  
5 Street in Council Member Perkins' district in  
6 Manhattan. A public hearing on this application was  
7 held on March 9th. The Council Member supports this  
8 designation.

9           The second item is LU 580 the Lowe's  
10 175th Street Theater, located at 4140-4156 Broadway  
11 in Council Member Rodriguez's district in Manhattan.  
12 A public hearing was held on this application on  
13 February 27th. The Council Member supports this  
14 designation.

15           The third items is LU 581, the Protestant  
16 Reformed Dutch Church of Flushing also know as the  
17 Brown Street Community Church located at 143-11  
18 Roosevelt Avenue in the district I represent in  
19 Queens. A public hearing was held on this  
20 application on February 27.

21           The fourth item is LU 582, the Lakeman -  
22 Cortelyou Taylor House located at 2286 Richmond Road  
23 in Council Member Matteo's district in Staten Island.  
24 A public hearing was held on this application on  
25 February 27. The council member is now supportive of

1  
2 this designation. I will now open the public hearing  
3 on 593. Before we start, I want to read Council  
4 Member Garodnick's statement of support. [pause]

5           This statement of support form Daniel  
6 Garodnick, Council Member. It says Council Member  
7 Peter Koo, Chair of the Committee on Landmarks and  
8 Public Siting and Maritime Uses. Dear Chair Koo, I  
9 write in support of this landmark designation of the  
10 United Nations Hotel First Floor Interiors at 1 and 2  
11 United Nations Plaza. These extraordinary spaces  
12 with the extraordinary use of mirrors, marble and  
13 combs (sic) as well as the distinctive lighting  
14 designs, play an important role in New York's  
15 cultural and economic salons of the late 1970s and  
16 1980s. They are beautiful examples of late 20<sup>th</sup>  
17 Century modern and post-modern design. The United  
18 Nations space is historic—historically significant  
19 and as practically impressive, and thus well  
20 deserving of land marking. I hope that the committee  
21 and ultimately the Council approves this—this  
22 designation. Sincerely, Daniel Garodnick.

23           LPC will present on this item, and then  
24 we will hear testimony from the public. May we have  
25 Lauren George and Lisa Kersavage of the Land Mark

1  
2 Preservation Commission. Please identify yourself  
3 and start now.

4 LAUREN GEORGE: Good morning Council  
5 Members. I'm Lauren George, Director of  
6 Intergovernmental and Community Affairs at Landmarks  
7 Preservation Commission. I also have with me my  
8 colleague Lisa Kersavage, Director of Strategic  
9 Planning of Strategic Planning at Landmarks [laughs]  
10 and Kate Lemos McHale, Director of Research also  
11 joining me today. So I want to thank you again for  
12 the opportunity to testify today on the commission's  
13 designation of the U.N. Hotel First Floor Interior  
14 located 1 and 2 UN Plaza. After holding a public  
15 hearing on November 22nd, 2016 the Landmarks  
16 Preservation Commission voted unanimously to  
17 designate the interiors on January 17th of this year.  
18 At the public hearing 15 people spoke in support of  
19 designation including representatives of Docomomo  
20 U.S., Docomomo Tri-State and New York District,  
21 Historic Districts Council, Municipal Art Society of  
22 New York and the New Your Landmarks Conservancy, Save  
23 the Grill and the Society for the Architecture of the  
24 City. LPC also received a resolution in support from  
25 Manhattan Community Board 6. The Ambassador Grill

1 and Hotel Lobby are significant examples of late  
2 modern and post-modern design by the internationally  
3 acclaimed architecture firm Kevin Roche, John  
4 Dinkeloo and Associates. This is NYC's youngest  
5 interior landmark designation, and the only interior  
6 designation that celebrates the post-modern period.  
7 These two interiors are located on the first floor of  
8 One UN New York, a hotel and office complex at the  
9 southwest corner of First Avenue and East 44th  
10 Street. It was built by the United Nations  
11 Development Corporation two phases. The first phase  
12 of construction was completed in 1975 and the second  
13 phase in 1983. Both interiors are located on the  
14 first floor. The hotel lobby parallels the entrance  
15 and driveway along East 44th Street, and the  
16 Ambassador Grill at the rear separated by an elevator  
17 lobby. The designated landmark site includes the  
18 dining and bar area and the Ambassador Grill and the  
19 primary features of the hotel lobby as you see here,  
20 including the domed reception area and entrance foyer  
21 and ramped hallway. Built in an era during-when  
22 relatively few new hotels are being constructed in  
23 New York City these lavish interiors are  
24 exceptionally well preserved. They blend modern and  
25

1  
2 historical motifs that express the shifting character  
3 of American architecture in the late '70s and early  
4 '80s. The U shaped Ambassador Grill and Lounge  
5 opened first in 1976. It's an extremely theatrical  
6 space featuring a patterned black and white marble  
7 floor, mirrored walls and a vaulted faux skylight  
8 backed by illuminated Mylar panels. The elegant  
9 hotel lobby was completed in 1993. It features an  
10 atrium like reception area and ramped hallway with  
11 free standing marble columns of unusual design. Its  
12 distinctive features suggest the growing influence of  
13 post-modern aesthetics during the 1980s. Both  
14 interiors were celebrated by contemporary critics.  
15 Paul Goldberger called the Grill New York's first  
16 hotel-first good hotel dining room since the 1920s.  
17 Carter Weisman described it as glittering piece of  
18 public theater and Ada Louse Huxtable wrote that  
19 these spaces have real style, the style and  
20 conviction of their own time. In her 2011 monograph  
21 on Roche, Architectural Historian Eeva-Lisa Pelkonen  
22 called these spaces significant representations of an  
23 era. With its over-the-top interiors, the hotel  
24 became a destination and an active participant in the  
25 disco era of the '70s and '80s when New York's



1  
2 economy finally turned around. Completed seven  
3 years apart, these marvelously inventive and well  
4 maintained interiors represent some of the best  
5 interior spaces of the '70s and '80s. We hope that  
6 the Council will affirm our designation today. Thank  
7 you, and any questions have, we're here to answer.

8 CHAIRPERSON KOO: Thank you. Any  
9 questions from our members. UPC? No? Thank you.  
10 Are there members of the public who wish to testify?  
11 We have Mr. Simeon Bankoff. [pause]

12 SIMEON BANKOFF: Good morning Council  
13 Members. Simeon Bankoff from the Historic Districts  
14 Council. It's my pleasure to testify in strong  
15 support of this interior designation. We are—I'd  
16 like to take a moment to sort of thank the Landmarks  
17 Commission for their recent very strong stances on—in  
18 designating a number of important interiors in New  
19 York City. As the Council know, interior landmarks  
20 are among the most—among the most rare of the  
21 landmarks. They are also among the most difficult to  
22 regulate. So we are extraordinarily happy that  
23 they're taking this stance on regulating really what  
24 amounts to a lot of glass and lights, and—and glass  
25 and lights can easily change. So this is something

1  
2 that was very delicate, and we are very thankful that  
3 they are designating. I have—I had the pleasure of  
4 going to this restaurant and bar a couple of times,  
5 and it's—it's just a wonderful experience I recommend  
6 to everyone to—to go on. I think they're—they're  
7 about to re-open. The only concern that we have is  
8 that in the original designation there was a portion  
9 of the front hallway, which was as you walk down  
10 there's the sloped entranced and then to the right,  
11 which is closer to the front of the building, which  
12 is the reception waiting area for the—for the lobby  
13 and for the restaurant, which is—complete the other  
14 piece with—with the rest of it, which has been—which  
15 was not part of the designation, and we feel that for  
16 whatever reason, you know, it's very possible that  
17 could be adapted into another use for the—for the  
18 hotel. We do think that with proper landmarks  
19 oversight it would be a wonderful addition to this  
20 designation but other than that, in strong support of  
21 this. Thank you, very much.

22 CHAIRPERSON KOO: Thank you. Any  
23 questions from our members? Seeing none, thank you.  
24 Are there any other members of the public who wish to  
25 testify? Seeing none, the public hearing on LU 593

1  
2 is now closed. Before we move onto a vote, I want to  
3 say a few words about LU 581, the designation  
4 application for Browne Street Community Church, which  
5 is in my district. The Browne Street Community  
6 Church formerly known as the Protestant Reformed  
7 Dutch Church of Flushing opened in 1892. The is  
8 church is a unique example of Roman-Romanesque  
9 Revival Style and features standing stained glass  
10 windows designed by Tiffany Glass Company. There is  
11 no dispute that the—there's no dispute that it is  
12 beautiful and historic. However, in 2002, the Chair  
13 of the Church Building Committee proposed demolit—  
14 demolition—demolishing the historic structure to  
15 allow its developer to build a 200-story residential  
16 building on—in exchange for the construction of a new  
17 church and payment of \$1 million. Members of the  
18 congregation, the local community board, and  
19 preservationists objected and the demolition plan was  
20 helved while alternative plans were considered.  
21 Recognizing the artistic and cultural significant of  
22 the structure, as well as the track of demolition or  
23 part of all of it, the Landmark Preservation  
24 Commission calendared the Browne Street Church for  
25 landmark designation in 2003. At that time LPC

1  
2 proposed designating the entire lot even though the  
3 church only occupies a fraction of it, a parking and  
4 an annex occupying the rest. Respecting the  
5 financial lease of the church, its non-public status  
6 is special admission in the vessel(sic) of the church  
7 property itself. My office worked closely with the  
8 LPC to redraw the designation map to exclude the  
9 parking lot and annex. When LPC finally issued its  
10 designation report on December 13, 2016, they  
11 accepted my office's recommendations freeing the  
12 church to exercise most of its development ways. The  
13 City Planning Commission's Report on the Designation  
14 confirmed this: The CBC report notes the redrawn  
15 designation area, and leaves the church with over  
16 100,000 square of unused development-developmental  
17 ways. Seeing that there is ample designation, some  
18 members of the congregation has expressed and  
19 steadfast support while others have expressed  
20 concerns. To explain how land marking works, I  
21 convened multiple meetings with church leadership.  
22 The LPC Chair and the Executive Director, the staff  
23 of the Council Land Use Division and the Landmarks  
24 Conservancy. During these meetings, LPC explained  
25 that the land mark designation only applied to the

1 exterior walls and the windows of the church. The  
2 internal model—the internal modifications will not  
3 require a certificate of proposed witness (sic) from  
4 LPC. LPC has assured me that you will do everything  
5 you can to process such requests through this expite—  
6 expedited certificate to upload the effect and  
7 service, which typically happens within 48 hours of  
8 submission. In order to make this process as early  
9 as possible, LPC has explained that it has a staffer  
10 dedicated full-time to servicing religious  
11 institutions. LPC has also expressed its clear  
12 understanding of the church's need to make  
13 accessibility alterations and stress that you will  
14 not work with the church--and stress that you will  
15 work with the church to look for ways to accommodate  
16 such needs even when they may have some impact on the  
17 exterior. Finally, since February 27, when we held a  
18 public hearing on this application for designation I  
19 have received over 345 emails asking me to support  
20 it. This designation application is not being using.  
21 I have done my best to enable the church to monetize  
22 the lands in your controls. Feeling it could develop  
23 over 90% of the allowable four areas on the site  
24 while preserving the ability of future generations to  
25

1  
2 enjoy this beautiful example of our art and  
3 architecture. For these reasons, I support the  
4 designation. I now recognize Council Member Perkins  
5 to speak on LU 579, the designation of the Young  
6 Men's Christian Association Building also known as  
7 Jackie Robinson YMCA Youth Center located in his  
8 district. Council Member.

9 COUNCIL MEMBER PERKINS: [off mic] Thank  
10 you, Mr. Chair, and I—I want [pause] [on mic] Thank  
11 you, Mr. Chair. I—I am honored to—to give my support  
12 to the Landmark designation of the Harlem YMCA at  
13 100–181 West 135th Street in my district. The YMCA  
14 Building now known as the Jackie Robinson YMCA Youth  
15 Center was built in the early 20th Century and was  
16 one of the first African-American YMCA buildings  
17 constructed in New York City. Although its  
18 construction was created to segregate African-  
19 Americans from the Caucasian individuals, it was and  
20 still is a center of intellectual and social life for  
21 the African-American community as is the new now  
22 Schomburg Center. It's Italian Neo-Renaissance  
23 Revival Style with its high base in arts and the kind  
24 of opening was unique to its time. Notable  
25 individuals who were associated with it lectured at

1  
2 it and held meetings in the Y, Claude McKay, John  
3 Henry Clark, Langston Hughes, Richard Wright, Jackie  
4 Robinson, Ralph Ellison, Adam Clayton Powel, Jr. and  
5 organizations such as Coordinated Committee on Civil  
6 Rights, the Harlem Writers' Workshop, just to name a  
7 few. Land marking this historic site will remind us  
8 all and others of the rich contributions of the  
9 Harlem Renaissance period. I fully support along  
10 with my colleagues and community this landmark  
11 designation. Thank you.

12 CHAIRPERSON KOO: Thank you. [pause] I  
13 want to say we welcome Council Member Matteo and then  
14 Council Member Kallos on--of our committee. Council  
15 Member Matteo, do you want to--Wait, one--one minute  
16 yeah. Before you move your marked side. (sic) Thank  
17 you. I moved it for Joseph. Yeah. Okay, yeah. The  
18 last thing today we are voting on LU 582 for the  
19 designation of the Lakeman-Cortelyou-Taylor House in  
20 Council Member Matteo's district. I know the council  
21 member has fought long and hard and had many  
22 conversation with the property owner, this community  
23 and the Landmarks Preservation Commission about this  
24 landmark designation and the fact that this item has  
25 been on the LPC calendar. I will now recognize

1  
2 Council Member Matteo to offer his remarks on this  
3 designation. Council Member Matteo.

4 COUNCIL MEMBER MATTEO: Thank you, Chair  
5 Koo. Before I give my prepared statement, I just  
6 want to thank my colleagues in this process for  
7 listening to my concerns and having the open-  
8 mindedness of the—the distinct new—distinct issues  
9 involved in—in this land marking case. I—I also  
10 appreciate landmarks and their position. None of  
11 this has been argumentative. We, you know, we just  
12 have different opinions on where we're going on this  
13 particular property. So again, I just want to thank  
14 my colleagues for listening to my concerns and—and  
15 taking them into consideration before you vote. My  
16 general philosophy in land marking cases in my  
17 district is to defer to the owner in the favor of  
18 property rights. In this case, however, I feel even  
19 more strongly that we should concede to the owner's  
20 request to not have his home land marked because he  
21 has been an upstanding and responsible member of the  
22 community who has proven that he values his  
23 building's heritage. The property in question on  
24 2286 Richmond Road in the heart of my district is a  
25 Dutch Colonial home that is owned by George



1  
2 Kirshhoffer. (sic) The home has been part of his  
3 family since grand—since his grandfather purchased it  
4 in 1927. George grew up in this home and raised his  
5 family—his own family there. Along with his children  
6 he has continued the family business Moravian Flowers  
7 on the lot next door. In 2001, George invested nearly  
8 half a million dollars to restore the home to its  
9 original glory removing an addition to the front and  
10 completing extensive roof work. The Landmark  
11 Commission noted not only the home's excellent  
12 condition, but the great care the owner took to  
13 restore its historical appearance. While the family  
14 has no plans to sell the property nor the family  
15 business, George has serious concerns about the  
16 costs and difficulties of maintenance and repair and  
17 accompanying landmark regulations. While I  
18 understand the concerns expressed by the  
19 preservationists that this historical site be  
20 protected, I have complete confidence in George and  
21 his family that they will continue to do just that.  
22 He has earned the benefit of the doubt. Also,  
23 today's vote will not preclude us from restarting  
24 this landmark process in the future. And again, I do  
25 believe that this is a different circumstance. The—

1 the owner of the property was here at the hearing.  
2 He—he certainly proved that he cares about this house  
3 and he is going to keep it in pristine condition, and  
4 I do not believe at this time that we should be  
5 moving forward with land marking the property, and  
6 with that, I will send it back to the Chair.  
7

8 CHAIRPERSON KOO: Thank you. I will now  
9 couple LUs 579, 580, 581, 582, and 593 for a vote to  
10 approve. Please note: A vote to approve LU 582 is a  
11 vote to disapprove the designation of Lakeman-  
12 Cortelyou-Taylor House. Counsel will—will please  
13 call the vote.

14 LEGAL COUNSEL: Council Member Koo.

15 CHAIRPERSON KOO: I vote aye.

16 LEGAL COUNSEL: Council Member Palma.

17 COUNCIL MEMBER PALMA: [off mic] Aye.

18 LEGAL COUNSEL: Council Member Mendez.

19 COUNCIL MEMBER MENDEZ: [pause]

20 Permission to explain my vote?

21 LEGAL COUNSEL: Yeah, please go ahead.

22 COUNCIL MEMBER MENDEZ: I will be voting  
23 aye on all including aye to disapprove No. 4. In—in  
24 the matter at hand, I do feel that the owner has made  
25 a lot of repairs and kept the building, the integrity

1  
2 and the architectural importance of the building,  
3 and—and I—dealing with our Landmarks building know  
4 that there are not enough grants when you're  
5 landmarked to get the repairs done that you need to  
6 in these buildings. Based on that, and on the fact  
7 that the owner has given Council Member Matteo a  
8 document that he does not intend to sell, that this  
9 building has been owned by the family for decades and  
10 decades. I am going to vote with the Council Member.  
11 Thank you very much.

12 CHAIRPERSON KOO: Thank you.

13 LEGAL COUNSEL: Council Member Levin.

14 COUNCIL MEMBER LEVIN: Permission to  
15 explain my vote.

16 CHAIRPERSON KOO: Yes, go ahead.

17 COUNCIL MEMBER LEVIN: I will be voting  
18 on—on all items as well, and I want to associate  
19 myself with the comments of Council Member Mendez.  
20 I'd—I'd also like to add that I do believe that we  
21 have in this Council a responsibility to weigh to the  
22 best of our ability and—and our conscience the and  
23 use matters in the districts that we represent, and I  
24 do feel that Council Member Matteo has weighted the  
25 considerations with this particular designation very

1  
2 thoroughly and conscientiously. And I'm heartened  
3 that he has--because it's not without reservations  
4 that I vote aye on this, but I take to heart his  
5 assurance that if something were to proceed in terms  
6 of any type of alteration on this project, he would--  
7 he would consider taking up a designation in that  
8 instance but that he's worked with the owner of the  
9 building. I understand that the family that has  
10 owned this building going back almost 100 years,  
11 obviously they--they love this building and in a way  
12 that--that they have preserved it for the past 100  
13 years. So I--I take that--those assurances to heart,  
14 and--and will--will look forward to continuing to work  
15 with Council Member Matteo if, in deed something were  
16 to change in the future, but with that, I do vote aye  
17 on all.

18 LEGAL COUNSEL: Council Member Rose.

19 COUNCIL MEMBER ROSE: I vote aye [coughs]  
20 aye on all, and--and aye on LU 582 with the assurances  
21 of my colleague Steve Matteo. Thank you.

22 LEGAL COUNSEL: Council Member Barron.

23 COUNCIL MEMBER BARRON: For clarification  
24 in terms of how this was presented, did you say that  
25

1  
2 to vote was to vote against that? Would you clarify  
3 that for me, please?

4 CHAIRPERSON KOO: [off mic} I do have the  
5 [on mic] IME.

6 COUNCIL MEMBER BARRON: Specifically as  
7 it pertains to 582.

8 CHAIRPERSON KOO: Land Use is a lease to  
9 disapprove of the nature is difficult.

10 COUNCIL MEMBER BARRON: Yeah, okay.  
11 Thank you. I just wanted to be clear on that. With  
12 that understanding, I vote aye and I just want to  
13 thank our Council Member Perkins for bringing to  
14 light the significance of the YMCA in Harlem  
15 particularly as it relates to African-American  
16 culture.

17 LEGAL COUNSEL: Council Member Kallos.

18 COUNCIL MEMBER KALLOS: [pause]  
19 Permission to explain my vote.

20 CHAIRPERSON KOO: Yes, please.

21 COUNCIL MEMBER KALLOS: Thank you to the  
22 committee chair and the staff for your great work. I  
23 want to apologize for my lateness. I-I vote aye on  
24 all and with regards to Land Use 582, I would like to  
25 just associate myself with my fellow colleagues, and-

1  
2 and champions for landmarks, Council Members Mendez  
3 and Levin. I'm disappointed with LPC and not being  
4 able to perhaps work with the owners to gain their  
5 support because I believe that Landmarks protections  
6 for this property would actually be an asset, and so  
7 whatever we can do with LPC so that owners are able  
8 to better understand that I'm disappointed in the  
9 city of New York because our Mayor has made a goal  
10 of preserving 120,000 units of affordable housing and  
11 many of the landmarked buildings would be and be as  
12 Council Member Mendez has already alluded to and  
13 stated it costs more to maintain landmarked buildings  
14 and we need to make sure that we provide support for  
15 landmarks, and we certainly have the funding to do  
16 so, and I just want to take a moment to appreciate  
17 Minority Leader Matteo's efforts in this working with  
18 LPC and working with the committee members, working  
19 with the owner on this one issue. There are so  
20 many different issues that he has to deal with as the  
21 leader of the Republican Caucus in the body and  
22 district and just focusing on this specific issue and  
23 trying to find a positive resolution not just  
24 approaching it from a specific item. And New  
25 York City is a very big city, and it's hard for any

1  
2 one member to have knowledge of all the other  
3 districts and then so we have to rely on that local  
4 member's expertise and in so doing I'm relying on  
5 Council Member Matteo's and the Council Members also  
6 indicating that should ownership change, should this  
7 property be in jeopardy that needs Landmark  
8 Preservation that he would, in fact, move forward  
9 with requesting evaluation moving forward with the  
10 Land Marks process and would actually support him in  
11 that case. So I vote aye with my colleague. Thank  
12 you.

13 CHAIRPERSON KOO: By a vote of 7 in the  
14 affirmative, 0 in the negative, and 0 abstentions the  
15 items are referred to the full Land Use committee  
16 with the recommendation to approve. [background  
17 comments]

18 CHAIRPERSON KOO: Thank you. Thank you.  
19 Thank you--[background comments] Thank you, members  
20 of the public, my colleagues, my Counsel-

21 LEGAL COUNSEL: A point of clarification.  
22 [background comments]

23 CHAIRPERSON KOO: Oh, okay.

24 LEGAL COUNSEL: The--the item--Item 582--the  
25 vote for Item 582 was approved, which means that

1 SUBCOMMITTEE ON LANDMARKS, PUBLIC SITING AND  
2 MARITIME USES

24

3 designation is forwarded to the full Land Use  
4 Committee with the recommendation to disapprove the  
5 designation.

6 CHAIRPERSON KOO: Thank you. Thank you,  
7 members of public, my colleagues and Counsel and Land  
8 Use staff. This meeting is adjourned. [gavel]

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C E R T I F I C A T E

World Wide Dictation certifies that the foregoing transcript is a true and accurate record of the proceedings. We further certify that there is no relation to any of the parties to this action by blood or marriage, and that there is interest in the outcome of this matter.



Date April 20, 2017