

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of the Application of
NEW YORK CITY COALITION TO END LEAD
POISONING, *et al.*

Petitioners-Plaintiffs

for a Judgment pursuant to Article 78
and § 3001 of the Civil Practice Law
and Rules

Index No. 120911/99

-against-

PETER VALLONE, as Speaker of the New
York City Council; *et al.*

Respondents-Defendants.

**REPLY AFFIRMATION OF MATTHEW J. CHACHÈRE
IN FURTHER SUPPORT OF
PETITION AND MOTION FOR PRELIMINARY INJUNCTION**

MATTHEW J. CHACHÈRE, an attorney admitted to practice in
New York State, hereby affirms the following as true under penalty
of perjury:

1. I am of counsel to Kenneth Rosenfeld, Esq., Northern
Manhattan Improvement Corporation Legal Services, attorneys for
petitioners-plaintiffs in this action. I make this reply
affirmation in further support of the Petition and Motion for
Preliminary Injunction Notice. This affirmation is based upon my
own personal knowledge and identifies the following additional
document submitted as an exhibit in the above-captioned action.

The attached is a true copy of the documents identified as an Exhibit:

Exhibit Description

Ex. 115. Testimony of Dr. Susan Klitzman, DrPH, former Assistant Commissioner for Environmental Risk Assessment and Communication for New York City Department of Health, presented at November 5, 1999, Public Hearing of the New York City Department of Health.

2. Based on the accompanying Petition, memorandum of law, and the supporting exhibits, and the reply memorandum of law, the reply affirmations and supporting exhibits thereto, petitioners-plaintiffs request the court to grant the relief sought and articulated in the accompanying Petition.

Dated: New York, New York
 November 10, 1999

/s/ Matthew J. Chachere
MATTHEW J. CHACHÈRE