

ITEM 3



DOLCE PANEPINTO

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RECEIVED
OCT 29 PM 1:52
ERIE COUNTY
WATER AUTHORITY

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October 25, 2018

COLLEEN M. MALCHOW
HOLLY L. SCHOENBORN
DONALD M. PANEPINTO
JOHN B. LICATA
RENE JUAREZ
EDWARD T. MAZZU, JR.
KRISTIN M. ALLEN
THORICE M. JACOBS
RICH HALL

Sent via email at
Foia@ECWA.org
Original via US Mail

Erie County Water Authority
350 Ellicott Square Building
295 Main Street
Buffalo, NY 14203

ANN M. NICHOLS
SAMUEL P. DAVIS
OF COUNSEL

RE: FOIA Request

Dear Sir/Madam:

I am writing this letter to request the release of certain documents under the Freedom Of Information Act. The information that I request is necessary for litigation, and any information delivered to myself will not be used for any commercial purposes, nor for any of the other enumerated exceptions to a freedom of information request.

I represent a client, Robert Berry, who was injured in an incident on January 7, 2018. At this time I would request copies of the following documents:

1. All dispatch recordings for 1/7/18 and 1/8/18 regarding a water main break at the corner of Elmview and Abbott Road in the City of Buffalo.
2. All communications between the Erie County Water Authority and Dig Safe and/or Verizon about the water main break at the corner of Elmview and Abbott Road on 1/7/18.
3. The names of the valve crew workers that responded to the water main break at the corner of Elmview and Abbott on 1/7/18.
4. The names of the Water Authority workers or contractors who responded to the water main break at the corner of Elmview and Abbott on 1/7/18.

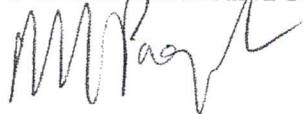
FRANK J. DOLCE
(1953 - 2016)

5. Any and all communications and/or correspondence in any form between the Erie County Water Authority and Dig Safe and/or Verizon and/or from any party about the accident involving Robert Barry on 1/7/18 at Elmview and Abbott.
6. Any incident report or accident investigation report prepared by the Erie County Water Authority involving the accident of Robert Barry at the corner of Elmview and Abbott on 1/7/18.
7. Any and all communication between the Erie County Water Authority and Verizon and any and all other parties regarding Robert Barry's injury / accident.

Thank you for your cooperation in this matter.

Very truly yours,

DOLCE PANEPINTO, P.C.



Marc C. Panepinto

MCP:cs