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July 7, 2022

COLLEEN M. MALCHOW HOLLY L. SCHOENBORN DONALD M. PANEPINTO KRISTIN M. ALLEN AARON C. GORSKI CASSIDY M. MARTIN

ANN M. NICHOLS SAMUEL P. DAVIS EDWARD T. MAZZU, JR. OF COUNSEL 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

RE: FOIA Request

FRANK J. DOLCE (1953 - 2016)

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, Kevin Letersky, who was injured in an incident on April 4, 2019. At this time I would request copies of the following documents:

- 1. All dispatch recordings for 4/4/19 regarding a water main break at the corner of Hanford and Blanding in the Town of Hanover.
- 2. All communications between the Erie County Water Authority and Dig Safe and/or National Fuel about the water main break at the corner of Hanford and Blanding in the Town of Hanover on 4/4/19.
- 3. The names of the valve crew workers that responded to the water main break at the corner of Hanford and Blanding in the Town of Hanover on 4/4/19.
- 4. The names of the Water Authority workers or contractors who responded to the water main break at the corner of Hanford and Blanding in the Town of Hanover on 4/4/19.



- 5. Any and all communications and/or correspondence in any form between the Erie County Water Authority and Dig Safe and/or National Fuel and/or from any party about the accident involving Kevin Letersky on 4/4/19.
- 6. Any incident report or accident investigation report prepared by the Erie County Water Authority involving the accident of Kevin Letersky at the on 4/4/19.
- Any and all communication between the Erie County Water Authority and National Fuel and any and all other parties regarding Kevin Letersky's injury / accident.
- 8. The name of the contractor that repaired the water main break at the corner of Hanford and Blanding in the Town of Hanover on 4/4/19.

Thank you for your cooperation in this matter.

Very truly yours,

**DOLCE PANEPINTO, P.C.** 

Marc C. Panepinto

MCP:cs



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