

September 10, 2026

Erie County Water Authority
Attn: Jennifer L. Hibit {foil@ecwa.org}
295 Main St., Room 350
Buffalo, NY 14203-2494

Dear Ms. Hibit:

Re: New York Central Mutual Fire Insurance Company as subrogee of
Kathleen S. Janicki
Our File No: 0005.45733

Pursuant to the New York Freedom of Information Law ("FOIL"), Article 6 of the Public Officers Law, please produce certified copies of the following records in the possession, custody, or control of the Erie County Water Authority ("ECWA"), whether maintained in paper, electronic, or other form.

1. Copies of any and all service records pertaining to the water main and/or water line located at or near 245 Orchard Park Road, West Seneca, 14224 ("subject property") involved in the water main break and resulting water loss occurring on or about August 7, 2026." Specifically, the water main and/or water line located in front of and/or near the subject property ("subject water main").
2. Copies of any and all records of telephone calls made to or received by the Erie County Water Authority concerning the subject water main and/or subject property on or about August 1, 2026, and August 7, 2026, including any available telephone logs and/or recordings of such calls;
3. Copies of any and all correspondence, emails, and/or letters pertaining to the subject water main from August 1, 2026, to the present;
4. Copies of any and all documents, correspondence, and/or emails relating to claims or complaints made against the Erie County Water Authority with respect to the subject water main from August 1, 2026, to the present;

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5. Copies of any and all service records pertaining to the subject water main located at or near the subject property from August 1, 2026, to the present;
6. Copies of any and all letters to Erie County Water Authority relating to the repair and/or maintenance of the subject water main from August 1, 2026, to the present;
7. Copies of any and all documents relating to claims or complaints made against Erie County Water Authority with respect to the subject water main;
8. Copies of all correspondence, electronic mail, text messages, facsimiles, work orders, contracts, or any other documentation in possession of Erie County Water Authority, regarding any work completed and/or conducted on the subject water main after August 5, 2026;
9. A log and/or documentation of all the employees, representatives, agents, servants, subcontractors, and/or independent contractors for Erie County Water Authority, who performed work and/or otherwise appeared at the subject water main from August 5, 2026, to the present;
10. Copies of all documents and/or materials used by Erie County Water Authority for training its employees, representatives, agents, servants, subcontractors, and/or independent contractors regarding waterline record keeping, servicing, repair, and/or maintenance during the five-year period prior to the subject incident.

If all of the requested records cannot be emailed to me, please inform me by email of the portions that can be emailed and advise me of the cost for reproducing the remainder of the records requested. Alternatively, if the requested records cannot be emailed to me due to the volume of records identified in response to my request, please advise me of the actual cost of copying all records onto a CD.

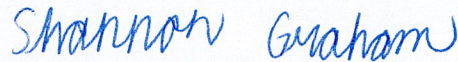
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Pursuant to Public Officers' Law Article 6, if for any reason any portion of my request is denied, please inform me of the particular justifications for not providing the requested documents or for redacting same, in writing and provide the name, address and email address of the person or body to whom an appeal should be directed.

Please (1) email your responsive documents, and (2) complete, sign, and include in the response email the attached certification form. *See Exhibit A.* Should you have any questions, please do not hesitate to reach out to the undersigned directly.

Very truly yours,



Shannon Graham
Paralegal

Attachment

FOIL Request Re: Erie County Water Authority / Amstar Projects

**CERTIFICATION OF BUSINESS RECORDS
PURSUANT TO CPLR 3122-a**

_____, being duly sworn, deposes and says:

1. I am the duly authorized custodian of records maintained by Erie County Water Authority and have the authority to make this certification.
2. To the best of my knowledge, after reasonable inquiry, the records or copies thereof that are produced herewith are true and accurate versions of the documents described in the FOIL request, dated September 10, 2026, that are in the possession, custody, or control of the Erie County Water Authority.
3. To the best of my knowledge, after reasonable inquiry, the records or copies produced represent all the documents described in the FOIL request, or if they do not represent a complete set of the documents subpoenaed, an explanation of which documents are missing and a reason for their absence is provided.
4. The records or copies produced were made by the personnel or staff of the business, or persons acting under their control, in the regular course of business, at the time of the act, transaction, occurrence, or event recorded therein, or within a reasonable time thereafter, and that it was the regular course of the business to make such records.

SIGNATURE

Sworn to before me this
____ day of _____, 2026

Notary Public