COUNTY CLERK

INDEX NO. 153974/2020 RECEIVED NYSCEF: 06/05/2020

Defendant's behaviors are preventing Plaintiff from providing for the health. 40. safety and well-being of other residents in the Building - something to which each and every

Building resident is entitled.

NYSCEF DOC. NO. 4

41. In light of the current 'stay at home' directives resulting from this Covid-19

pandemic, Plaintiff has no choice but to seek intervention from the Court to enjoin Defendant

from his continued dangerous behavior.

Based on the foregoing, Plaintiff respectfully requests, in accordance with Article 42.

20 of the Lease, that the Court enjoin Defendant from: (a) smoking in the Building hallways and

leaving cigarette butts in the hallways; (b) conducting any sort of work in his apartment -

construction or otherwise - that could damage the Building or any Building-wide systems; (c)

threatening other residents in any manner, including, but not limited to, screaming at them or

throwing liquid substances on their apartment doors; and (d) otherwise continuing his course of

conduct that is endangering the health, safety and well-being of other residents at 111 Sullivan

Street, New York, New York.

Sworn for before me this day of June, 2020.

Notary Public, State of New York

Qualified in New York County Commission Expires August 14, 20