

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

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SULLIVAN PROPERTIES, L.P., Index No.: _____/2020

Plaintiff,

-against- AFFIDAVIT OF

ANDRES REYNOSO

BARIS DINCER,

Defendant.

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STATE OF NEW YORK)

:ss:

COUNTY OF NEW YORK)

ANDRES REYNOSO, being duly sworn, deposes and states:

1. I am employed by Manhattan Skyline Management Corp., the managing agent for Sullivan Properties, L.P., the owner of the building located at 111 Sullivan Street, New York, New York (the “Building”) as the resident manager of the Building. As such, I am familiar with the facts regarding this matter.
2. I submit this affidavit in support of Plaintiff’s Order to Show Cause seeking an injunction against defendant, Baris Dincer (“Defendant”), in accordance with Article 20 of the subject lease, enjoining Defendant from (i) smoking in the Building hallways and leaving cigarette butts in the hallways; (ii) conducting any sort of work in his apartment – construction or otherwise – that could damage the Building or any Building-wide systems; (iii) threatening other residents in any manner, including, but not limited to, screaming at them or throwing liquid substances on their apartment doors and breaking apartment windows; and (iv) 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.
3. On May 26, 2020, I entered Defendant’s apartment to inspect after the massive flood that was discovered in apartment 1BR the prior weekend.
4. Upon entering, I discovered that Defendant – without the knowledge and consent of the Plaintiff – undertook extensive renovation work in the Premises. The Defendant installed new ceramic tile flooring in the living room and bedroom – over the hardwood floors, he installed vinyl floor tiles over the ceramic tiles in the bathroom, he removed the closet doors and removed the air conditioning unit from the window

(the unit is missing). Photographs that I took of Defendant’s apartment on May 26, 2020 are annexed to the accompanying Regan Affidavit as **Exhibit**.

5. Not only did the Plaintiff not approve any of the work that Defendant undertook in his apartment, but as a result of his illegal and disruptive construction work, he caused untold damage to apartment 1BR. See, **Exhibit** to the accompanying Regan Affidavit. The entire apartment has to be fixed – from the bathroom to the walls and the floors throughout – all as a result of the water damage.
6. Defendant’s ever escalating behavior is causing physical damage to the Building and is preventing Plaintiff from providing for the health, safety and well-being of other residents in the Building – something to which each and every Building resident is entitled.

ANDRES REYNOSO

Sworn to before me this
____ day of June, 2020.

Notary Public