

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

- - - - -x
MILAGROS MUSSE,

Plaintiff,

Docket No.:
158546/2015

-against-

TRIBOROUGH BRIDGE AND TUNNEL AUTHORITY AND PORT
AUTHORITY OF NEW YORK AND NEW JERSEY,

Defendants.

- - - - -x

Oral deposition of ASSEM RAMADAN, on behalf of Defendant, Triborough Bridge and Tunnel Authority, taken pursuant to Order, was held at the Law Offices of Kenneth Arthur Rigby, PLLC, 15 Maiden Lane, Suite 803, New York, New York 10038, commencing September 10th, 2018, at 12:57 p.m., on the above date, before AMBRIA IANAZZI, a Court Reporter and Notary Public in and for the State of New York.

- - - - -x

MAGNA LEGAL SERVICES
(866) 624-6221
www.MagnaLS.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S:

KAZMIERCZUK AND MCGRATH

Attorneys for Plaintiff
103-16 Metropolitan Avenue
Forest Hills, New York 11375

BY: KATHERINE M. McGRATH, ESQ.

BETANCOURT, VAN HEMMEN, GRECO & KENYON LLC

Attorneys for Defendant
PORT AUTHORITY OF NEW YORK
AND NEW JERESY
46 Trinity Place, 5th Floor
New York, New York 10006

BY: KRISTIN K. ROBBINS, ESQ.

KENNETH ARTHUR RIGBY PLLC

Attorneys for Defendant
TRIBOROUGH BRIDGE AND TUNNEL
AUTHORITY
15 Maiden Lane, Suite 803
New York, New York 10038

BY: JOHN R. WIESS, ESQ.

1

2

S T I P U L A T I O N S

3

4

5

IT IS HEREBY STIPULATED AND AGREED by and
between the attorneys for the respective parties
herein as follows:

6

7

8

9

10

11

12

All rights provided by the C.P.L.R. and
Part 221 of the Uniform Rules for the Conduct of
Depositions, including the right to object to any
question except as to form, or such other
irregularity that would be waived if not
interposed, or to move to strike any testimony at
this examination is reserved.

13

14

15

16

17

18

19

20

21

22

23

24

25

No objections shall be made at a
deposition except those which, pursuant to
subdivision (b), (c), or (d) of Rule 3115 of the
Civil Practice Law and Rules, would be waived if
not interposed, and except in compliance with
subdivision (e) of such Rule. All objections
made at a deposition shall be noted by the
officer before whom the deposition is taken, and
the answer shall be given and the deposition
shall proceed subject to the objections and to
the right of a person to apply for appropriate
relief pursuant to Article 31 of the C.P.L.R.

Every objection raised during a

1
2 deposition shall be stated succinctly and framed
3 so as not to suggest an answer to the deponent
4 and, at the request of the questioning attorney,
5 shall include a clear statement as to any defect
6 in form or other basis of error or irregularity.
7 Except to the extent permitted by C.P.L.R. Rule
8 3115 or, by this Rule, during the course of the
9 examination persons in attendance shall not make
10 statements or comments that interfere with the
11 questioning.

12 A deponent shall answer all questions at
13 a deposition, except (i) to preserve a privilege
14 or right of confidentiality, (ii) to enforce a
15 limitation set forth in an order of a court, or
16 (iii) when the question is plainly improper and
17 would, if answered, cause significant prejudice
18 to any person. An attorney shall not direct a
19 deponent not to answer except as provided in
20 C.P.L.R. Rule 3115 or this subdivision. Any
21 refusal to answer or direction not to answer
22 shall be accompanied by a succinct and clear
23 statement of the basis therefore. If the
24 deponent does not answer a question, the
25 examining party shall have the right to complete

1

2 the remainder of the deposition.

3

4 An attorney shall not interrupt the
5 deposition for the purpose of communicating with
6 the deponent unless all parties consent, or the
7 communication is made for the purpose of
8 determining whether the question should not be
9 answered on the grounds set forth in section
10 221.2 of these Rules and, in such event, the
11 reason for the communication shall be stated for
12 the record succinctly and clearly.

13 This deposition may be sworn to by the
14 WITNESS being examined before a Notary Public
15 other than the Notary Public before whom this
16 examination was begun, but the failure to do so
17 or to return the original of this deposition to
18 counsel shall not be deemed a waiver of the
19 rights provided by Rule 3116 of the C.P.L.R. and
20 shall be controlled thereby.

21 The filing of the original of this
22 deposition is waived.

23

24

25

26

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.