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VILLAGE OF GREENPORT
COUNTY OF SUFFOLK : STATE OF NEW YORK
-----X
PLANNING BOARD
WORK SESSION & REGULAR MEETING
-----X

November 29, 2021
4:00 p.m.

B E F O R E:
WALTER FOOTE - CHAIRMAN
PATRICIA HAMMES - MEMBER
REED KYRK - MEMBER

NOT PRESENT:
LILY DOUGHERTY-JOHNSON - MEMBER

ALSO IN ATTENDANCE:
PAUL PALLAS - VILLAGE ADMINISTRATOR
ROBERT CONNOLLY - VILLAGE ATTORNEY
AMANDA AURICHIO - CLERK TO THE BOARD
KATE McDOWELL - VILLAGE RESIDENT

1 **(*The meeting was called to order at 4 p.m.*)**

2 CHAIRMAN FOOTE: Good afternoon. Welcome
3 to the Village of Greenport. This is our
4 Planning Board and it's a Work Session/Regular
5 Meeting. It's Monday, November 29th, 2021, a
6 little after 4 p.m..

7 *Item No. 1 is a motion to accept and*
8 *approve the minutes of the October 28, 2021*
9 *Planning Board Work Session and Regular Meeting.*
10 Do I have a second to this motion?

11 MEMBER HAMMES: Second.

12 CHAIRMAN FOOTE: All in favor?

13 MEMBER KYRK: Aye.

14 MEMBER HAMMES: Aye.

15 CHAIRMAN FOOTE: Aye. Motion carries.

16 *(VOTE: 3-0-0-1 - Not Present: Member*
17 *Dougherty-Johnson).*

18 *Item No. 2 is a motion to schedule the*
19 *combined Planning Board/Work Session and Regular*
20 *Meeting for 4:00 p.m. on December 30th, 2021.*

21 Is that a Thursday, by the way?

22 MEMBER KYRK: Yes, it is.

23 CHAIRMAN FOOTE: Okay. Do I have second to
24 that?

25 MEMBER HAMMES: I'll second.

1 CHAIRMAN FOOTE: All in favor?

2 MEMBER KYRK: Aye.

3 MEMBER HAMMES: Aye.

4 CHAIRMAN FOOTE: Aye. Motion carries, the
5 meeting is so scheduled. (VOTE: 3-0-0-1 - Not
6 Present: Member Dougherty-Johnson).

7 *Item No. 3 - 19 Front Street. This is a*
8 *Pre-Submission Conference with possible motion to*
9 *schedule a Public Hearing for December 30th,*
10 *2021, regarding the site plan application of*
11 *Kathleen McDowell. The applicant proposes to*
12 *have outdoor seating in the rear of the building.*
13 *This property is located in the (W-C)*
14 *(Waterfront-Commercial) District and is not*
15 *located in the Historic District. Suffolk County*
16 *Tax Map 1001-5.-4-29. And hi.*

17 MS. McDOWELL: Hi.

18 CHAIRMAN FOOTE: Would you like to --

19 MS. McDOWELL: Sure.

20 CHAIRMAN FOOTE: -- announce yourself?

21 MS. McDOWELL: I'm Kate McDowell, 19 Front
22 Street, Greenport.

23 CHAIRMAN FOOTE: Okay.

24 MS. McDOWELL: Basically, what we're trying
25 to do is split our existing seating that we

1 already have. So we're not actually adding
2 seating, we're just trying to make people more
3 comfortable and we still have a lot of customers
4 that prefer to sit outside.

5 CHAIRMAN FOOTE: Uh-huh.

6 MS. McDOWELL: So, basically we have six
7 tables, so right now I have three that are in the
8 rear of the building and we're only operating two
9 inside. Because I don't know if you've ever been
10 to our shop, but it's very intimate and small, so
11 it's really hard to distance everyone six feet
12 apart.

13 CHAIRMAN FOOTE: Okay. So you're not
14 trying to increase your seating capacity.

15 MS. McDOWELL: No.

16 CHAIRMAN FOOTE: You're just trying spread
17 it out --

18 MS. McDOWELL: Right.

19 CHAIRMAN FOOTE: -- By including the
20 outdoor space.

21 MS. McDOWELL: Right.

22 CHAIRMAN FOOTE: Okay. And is this
23 intended to be year-round; is that what you're
24 planning to do?

25 MS. McDOWELL: Well, I think as long as

1 COVID is still an issue and people, you know,
2 don't feel safe eating inside.

3 CHAIRMAN FOOTE: Uh-huh.

4 MS. McDOWELL: I mean, we had people, you
5 know, outside this weekend. It was freezing --

6 CHAIRMAN FOOTE: Right.

7 MS. McDOWELL: -- but people still insisted
8 on being outside.

9 CHAIRMAN FOOTE: Right. Okay.

10 Any questions?

11 MEMBER HAMMES: Yeah. What was that area
12 previously used for? I mean, is it --

13 MS. McDOWELL: My parking.

14 MEMBER HAMMES: So it is parking. And is
15 there an apartment above your store?

16 MS. McDOWELL: There is.

17 MEMBER HAMMES: And was it used for parking
18 for that as well?

19 MS. McDOWELL: No, no.

20 MEMBER HAMMES: So it's just parking for
21 people --

22 MS. McDOWELL: It was just for myself and
23 an employee, but all my employees just walk to
24 work because they're all from Greenport.

25 MEMBER HAMMES: Okay. But is it -- are you

1 still using a piece of it for parking or --

2 MS. McDOWELL: No. Claudio's is giving me
3 permission to park on their property.

4 MEMBER HAMMES: Now, but probably not in
5 the Summertime.

6 MS. McDOWELL: Actually, I have had no
7 problems parking there in the Summer as well.

8 CHAIRMAN FOOTE: Okay. But it's
9 basically -- you're taking away -- it's replacing
10 two parking spots, basically.

11 MS. McDOWELL: Right.

12 CHAIRMAN FOOTE: As outdoor space.

13 MS. McDOWELL: Right.

14 MEMBER HAMMES: And what -- is there -- I
15 mean, I've been in your store but not recently.
16 I mean, is it that people come in and order and
17 then go out the back, or how does the --

18 MS. McDOWELL: Oh. So, basically --

19 MEMBER HAMMES: -- ingress/egress work for
20 that area?

21 MS. McDOWELL: -- we don't provide table
22 service out there, or actually in the shop. It's
23 more like a deli where you would come up, you
24 would order your food, you would, you know,
25 choose your drink and then you would pay. When

1 the order is ready then we would deliver it to
2 the people. There is a straight run from the
3 dining room to the hallway past the bathrooms,
4 they -- public bathrooms to the back. So they're
5 not like coming through the kitchen or anything
6 like that.

7 MEMBER HAMMES: So people come in, they
8 order it and then you tell them that there's
9 seating out there if they want it, I mean, or do
10 they just already know?

11 MS. McDOWELL: No. They -- we have a sign
12 that says *Outside Seating*. So if they request to
13 seat outside, we take them -- you know, we take
14 them and, you know, show them what's available.

15 CHAIRMAN FOOTE: It's like {Alva's} you
16 know, you can go in or you can go out. I
17 understand.

18 MEMBER HAMMES: I mean, as I mentioned at
19 the last meeting which you were not at --

20 MS. McDOWELL: Yeah, I apologize for that.

21 MEMBER HAMMES: No, that's okay, that's
22 okay. I -- my concern is maybe not specific to
23 you, it's frankly a concern more about the number
24 of other establishments that have also widened
25 their footprint during COVID that have not come

1 for site plan approval and whether or not we want
2 to -- you know, how -- I'm concerned about
3 setting precedence for approving things, then
4 somebody with a bigger space comes and says,
5 *Well, we've been doing this for COVID and we want*
6 *to keep doing it.*

7 I mean, I'm not -- I'm not saying I'm
8 against this yet, but I do think that that's
9 something that this Board needs to think about,
10 particularly on the parking point. I understand
11 that you're saying you don't have a problem
12 parking, but as my fellow Board Members may or
13 may not know, the Board of Trustees is currently
14 considering amendments to the parking rules in
15 the Village, including the grandfathering. And I
16 am reluctant at this point, given some of the
17 conversations at least that I've had with people
18 in the Village, to do things that take away
19 parking spots, whether they're being used today
20 or not.

21 So, I understand this is not necessarily
22 very specific to you.

23 MS. McDOWELL: Right.

24 MEMBER HAMMES: Although it obviously comes
25 about because of your application. I have to

1 honestly say right now I have sympathy because of
2 COVID, but I also believe that there are places
3 people can sit in the park right now that aren't
4 full all the time. And so I will just say right
5 now, my inclination is that I'm not sure I am in
6 a position to approve this application.

7 MS. McDOWELL: The problem that they have
8 with going to the park, if they decide they want
9 a dessert or if they want another drink, they're
10 at the park, they can't really access that.

11 MEMBER HAMMES: So, I don't -- I mean, I'd
12 be interested in hearing my fellow Board Members
13 views on some of those points.

14 CHAIRMAN FOOTE: Do you have any thoughts?

15 MEMBER KYRK: Well, I haven't been privy --
16 I'm not privy to any of the discussions about
17 parking, although it's been an issue that I'm,
18 you know --

19 MEMBER HAMMES: Well, at the Trustee Work
20 Sessions, just so you know, it's not -- this is
21 on the public record because it was done at Work
22 Sessions and it was recorded. The intention
23 potentially is to get rid of the grandfathering
24 provisions that exempts buildings in downtown
25 from providing parking if they were in existence

1 prior to '91. So, I don't know where that's
2 going to go. I don't know what the specifics
3 are. I don't know even know if it would pass
4 because I've made several points on it in my
5 personal capacity at Board Meetings. But I do
6 know that the Village is at a point of inflection
7 right now on the parking point.

8 And I get that this is only two spots. But
9 I also know, for instance, when Greenhill was
10 coming up before COVID for that use in the back
11 of their space, which they're also now have --
12 like that's not as their site plan the way
13 they're using it, so presumably they need to be
14 coming back at some point if they want to keep
15 using that.

16 CHAIRMAN FOOTE: Right.

17 MEMBER HAMMES: We had expressed concern
18 about the parking, loss of parking spots there as
19 well, so.

20 CHAIRMAN FOOTE: Yeah.

21 MS. McDOWELL: I would just like to say
22 something. It is possible that I would be able
23 to park back there as well as have the seating.
24 I can rearrange it a little bit if that's an
25 issue.

1 MEMBER KYRK: So basically it would be net
2 loss of one space; would that be correct?

3 MS. McDOWELL: No, I could actually fit two
4 cars there and just rearrange.

5 CHAIRMAN FOOTE: Well, obviously if you can
6 do that, that would be preferable.

7 MS. McDOWELL: Okay.

8 CHAIRMAN FOOTE: I mean, I personally am
9 sensitive to your request and you trying to
10 address a business issue and, you know --

11 MS. McDOWELL: Thank you.

12 CHAIRMAN FOOTE: -- and you're trying to
13 create more space. That's your property,
14 obviously, right? You're --

15 MS. McDOWELL: No, it's actually I have a
16 right-of-way there. The property is actually
17 owned by Claudio's, but I have a right-of-way and
18 I have two spaces for that right-of-way.

19 CHAIRMAN FOOTE: But do you not
20 contractually need permission from them to use it
21 that way?

22 MS. McDOWELL: No. They -- when I went to
23 them and spoke to them about using the space,
24 they did not have an issue. They're not charging
25 me anything to use the space, they just asked

1 that they be named on the insurance policy.

2 CHAIRMAN FOOTE: I see. Yes, Paul.

3 ADMINISTRATOR PALLAS: I apologize, Mr.
4 Chairman. My -- just a clarification. My memory
5 is that when this application came up we did
6 double check the survey to make sure it wasn't a
7 separate parcel. I believe it's part of that
8 same parcel. I don't think it's separate, I
9 think it's one parcel that has the building and
10 this extra space. I don't think that 18 feet is
11 a right-of-way. I believe it's part of your
12 landlord's property.

13 MS. McDOWELL: Well, I own the building.

14 ADMINISTRATOR PALLAS: Because the survey
15 shows that property.

16 MS. McDOWELL: Yeah, it shows that it is
17 the right-of-way.

18 ADMINISTRATOR PALLAS: It shows it's your
19 property.

20 MS. McDOWELL: Oh. Well, that's --

21 ADMINISTRATOR PALLAS: I'm going to have
22 to -- again, I apologize. I may have to triple
23 check now. I know I checked twice.

24 MS. McDOWELL: Yes, I should check that
25 out. Thank you.

1 ADMINISTRATOR PALLAS: That's my memory,
2 I'll double check.

3 MS. McDOWELL: Okay.

4 CHAIRMAN FOOTE: If you're going to
5 propose --

6 MEMBER HAMMES: I have another question.

7 CHAIRMAN FOOTE: -- designing this where
8 you can accommodate parking, we're going to need
9 to see what that looks like?

10 MS. McDOWELL: Okay.

11 CHAIRMAN FOOTE: And then you can come back
12 and submit that, a drawing of what you're talking
13 about.

14 MS. McDOWELL: Oh, okay.

15 CHAIRMAN FOOTE: And then we can then set
16 up a public hearing.

17 MS. McDOWELL: Okay.

18 MEMBER HAMMES: I have another question on
19 that. I don't know if there's -- I don't know if
20 this is a question that -- you won't be able
21 to -- I don't think you'll be able to answer
22 this, I don't know if Paul or Rob will be able to
23 answer this which is, you know, you sell alcohol
24 there so you have a liquor license and how that
25 works with the expansion of the footprint.

1 MS. McDOWELL: We do. And in order to
2 serve liquor out there, we have to have approval
3 which we've applied for. We don't serve liquor,
4 we have a tavern license, so it's wine and beer
5 only. But we have applied in the hopes that we
6 would get the okay through you guys.

7 MEMBER HAMMES: Are you a restaurant or an
8 Ag Market?

9 MS. McDOWELL: We're Ags & Markets.

10 MEMBER HAMMES: Okay.

11 CHAIRMAN FOOTE: Okay. Anything else?
12 Anybody else have any questions, comments?

13 So I think the idea here is you should
14 resubmit a detailed plan.

15 MS. McDOWELL: Okay.

16 CHAIRMAN FOOTE: Okay, that explains where
17 you'll put the parking.

18 MS. McDOWELL: Okay.

19 CHAIRMAN FOOTE: And then just come up with
20 a new layout.

21 MS. McDOWELL: Okay.

22 CHAIRMAN FOOTE: And then we can set up a
23 Public Hearing.

24 MS. McDOWELL: Okay.

25 CHAIRMAN FOOTE: Or you have to go through

1 the Public Hearing now.

2 MS. McDOWELL: All right. Sounds good.

3 CHAIRMAN FOOTE: All right?

4 MS. McDOWELL: Yep.

5 CHAIRMAN FOOTE: All right, thank you.

6 MS. McDOWELL: Anything else? Can I leave?

7 CHAIRMAN FOOTE: You can leave.

8 MS. McDOWELL: All right. Thank you so
9 much.

10 ADMINISTRATOR PALLAS: Mr. Chairman, just
11 for clarification. So you're going to continue
12 the Pre-Submission next month as opposed to
13 schedule the hearing for next month? Is that
14 what I understand?

15 CHAIRMAN FOOTE: I think -- I mean, let me
16 speak to you because we may need your vote to get
17 this finally submitted for approval. If it
18 accommodates that parking requirement, are you
19 more inclined to agree with it?

20 MEMBER HAMMES: Probably with certain other
21 conditions like the combined number of people
22 inside and outside isn't more. And frankly, I
23 might want a drop-dead date on it, because the
24 only reason I would be willing to approve it is
25 because it's a business, trying times from COVID.

1 And, you know, we keep thinking we're coming out
2 of it but we may not be.

3 But I'm -- overall -- and again, this is
4 not -- yours would be very easy in the greater
5 scheme of things to approve. It's more that I
6 have a bigger issue with people starting to
7 broaden their footprints outside with seating and
8 alcohol in the Village.

9 MS. McDOWELL: Right.

10 MEMBER HAMMES: And so I recognize this is
11 a small area and it would be nice to accommodate
12 it. I just have a real concern about the
13 precedent, so I need to think some more about
14 that.

15 CHAIRMAN FOOTE: Right. But in fairness,
16 there have been prior cases where restaurants
17 have requested expanding their outdoor. For
18 example, Andy's; I think we had an application --

19 MEMBER HAMMES: I don't know that I was on
20 the Board when that happened, so.

21 CHAIRMAN FOOTE: Okay. Well, in light of
22 that discussion, we'll schedule the Public
23 Hearing for the next meeting with the
24 understanding that you will have submitted, you
25 know, well in advance the revised drawings --

1 MS. McDOWELL: Right.

2 CHAIRMAN FOOTE: -- so they can be
3 available for us to look at.

4 MS. McDOWELL: So when is the next meeting?

5 MEMBER HAMMES: December 30th.

6 MS. McDOWELL: Okay.

7 CHAIRMAN FOOTE: It's a Thursday, December
8 30th.

9 MS. McDOWELL: Oh, okay. So, I can get
10 that to them within two weeks; is that --

11 MEMBER HAMMES: That's fine.

12 CHAIRMAN FOOTE: Yeah. I mean, if it's
13 going to be like this you can probably get it to
14 them in two days.

15 MS. McDOWELL: Yeah. Well, just getting
16 ready for a Shellabration this weekend.

17 CHAIRMAN FOOTE: Understood, yeah.

18 MS. McDOWELL: So, a lot of cooking going
19 on.

20 CHAIRMAN FOOTE: Yeah. And if we have it
21 within two weeks before the next meeting --

22 MS. McDOWELL: Oh, okay.

23 CHAIRMAN FOOTE: -- that should be fine.

24 MS. McDOWELL: All right, great. Thank you.

25 CHAIRMAN FOOTE: All right, thank you.

1 MEMBER KYRK: Maybe just to set
2 expectation, we simply need the lot layout,
3 really, to basically (*indiscernible*) --

4 CHAIRMAN FOOTE: Yeah, you should get a
5 copy of your survey and make kind of -- you know,
6 if you're going to -- are you going to be doing
7 it yourself, the mark-up?

8 MS. McDOWELL: Yes.

9 CHAIRMAN FOOTE: Okay. Try to get to the
10 bottom of what your boundaries are.

11 MS. McDOWELL: Okay.

12 CHAIRMAN FOOTE: Similar to what is your
13 lot so that that's clear, and where you propose
14 to have everything set up within that lot.

15 MS. McDOWELL: Oh, okay.

16 CHAIRMAN FOOTE: Including the parking.

17 MS. McDOWELL: Can I come to you to get
18 that?

19 ADMINISTRATOR PALLAS: Yes.

20 MS. McDOWELL: Okay. After the weekend?

21 ADMINISTRATOR PALLAS: That's fine.

22 MS. McDOWELL: Okay, great.

23 CHAIRMAN FOOTE: Great.

24 MS. McDOWELL: All right.

25 CHAIRMAN FOOTE: Thank you.

1 MS. McDOWELL: Thanks again.

2 CHAIRMAN FOOTE: Okay. So the next item
3 I'm going to refer to my colleague.

4 MEMBER HAMMES: I just -- I wanted to add
5 an other on here today. And it's not really
6 something we have to get into but it relates to
7 part of this conversation which is I just
8 wanted -- to the extent my fellow Board Members
9 were not aware, that the Trustees have been
10 starting to undertake discussions about, one,
11 picking back up the LWRP, as well as amendments
12 to the Parking Code and potentially moratoriums
13 on restaurants and hotels downtown.

14 And I think it would be helpful if --
15 obviously not at this meeting, but maybe we all
16 need to start giving some thoughts to our views
17 as the Planning Board, given that a lot of these
18 things come before us and if there's any input
19 that we would want to provide the Trustees on
20 views that we might or might not have on those
21 items.

22 Perhaps at some point, whether it's at the
23 next meeting or the January meeting, we could
24 have somewhat -- assuming it's allowed, of a kind
25 of open discussion about some of our views on

1 those things. It seems to me that we, you know,
2 again are a part of that process indirectly given
3 that the site plans come before us.

4 MEMBER KYRK: I'm notoriously bad with
5 that; pronounce LWRP?

6 MEMBER HAMMES: It's the Waterfront
7 Revitalization Plan. It's basically the planning
8 document for the Village which was redone in
9 2012? But never formerly adopted. It's very
10 long, it's a hundred plus pages long. And I --
11 so I guess we're still living under, what, the
12 1988 LWRP, technically?

13 ADMINISTRATOR PALLAS: Technically, yes.

14 MEMBER HAMMES: Yes. And my understanding
15 is it won't be accepted by the State. It's a
16 document that has to be accepted by the State
17 because there's some issues with the form of it.
18 But it's obviously also, I would think, somewhat
19 out of date at this point when you think about
20 the changes in the Village since 2012 when it was
21 done.

22 So I think that the Village is going to go
23 out for a consultant to assist on that. But in
24 the meantime they are also, as I understand it,
25 considering amendments to the parking provisions

1 and potentially a moratorium pending LWRP review
2 and zoning changes on hotels and restaurants.

3 And so I just, one, wanted to make sure
4 that everybody knew about that it's relevant
5 information for this Board to have.

6 And two, I do think that it is something
7 that we should be giving some thought to in terms
8 of if there's anything we would like to provide
9 feedback on, which may not be the case but we are
10 the Planning Board for the Village, so we have
11 some reason to be considering these issues.
12 So that was really my other business.

13 CHAIRMAN FOOTE: Okay.

14 MEMBER HAMMES: More to just highlight that
15 there may be some changes coming down the pike
16 that I think we should be thinking about as a
17 Board.

18 CHAIRMAN FOOTE: What would be the process
19 for providing our input; how would that work?

20 ADMINISTRATOR PALLAS: I'll let Rob
21 answer.

22 ATTORNEY CONNOLLY: The Trustees usually
23 ask for the Planning Board's input.

24 MEMBER HAMMES: At some point. But, I
25 mean, they had a while back, right? As I recall,

1 two years ago before COVID they had asked for us
2 to write a letter; I don't know if it ever got
3 submitted to them --

4 CHAIRMAN FOOTE: On parking

5 MEMBER HAMMES: -- on parking. And I have
6 to go back and look at the code. I think,
7 actually, that perhaps changes to the Zoning Code
8 have to even kind of ultimately get involved in
9 the ZBA and the Planning Board, but I may be
10 wrong about that.

11 ADMINISTRATOR PALLAS: There's some --

12 MEMBER HAMMES: I know there was some
13 language in the Code that said any proposed
14 amendments had to be reviewed and commented on by
15 us. Again, it was more -- we may not want to do
16 anything about it, but it just seems we've heard
17 a lot of the issues on this and we know some of
18 the things that are coming down the pike. And so
19 I really just wanted to raise it for people on
20 this Board to start thinking about and we can
21 wait and ask for the Board to solicit our, you
22 know, opinions and that's fine, but I think it's
23 just information that we need to kind of have in
24 our mind as we are doing things.

25 MEMBER KYRK: Are the existing documents

1 readily available from '88 and 2012?

2 MEMBER HAMMES: The LWRP is on-line, it's
3 really long. I think the library has a hard copy
4 of it. It's about 150 pages?

5 ADMINISTRATOR PALLAS: Yeah. There's
6 actually, that's the companion document that's
7 called the Harbor Management Plan which is an
8 appendix which is just as thick as the LWRP.
9 So it's rather lengthy. I mean, a lot of it you
10 can buzz through relatively quickly.

11 MEMBER KYRK: I just wanted to see the
12 scope and what any previous, you know, thoughts
13 were or anything --

14 MEMBER HAMMES: I mean, it does have things
15 in it that it suggests should be undertaken as
16 zoning amendments that were never formally
17 adopted. It's an interesting document to flip
18 through, but you're not going to want your own
19 personal copy of it.

20 MEMBER KYRK: Right.

21 MEMBER HAMMES: *(Laughter)*.

22 MEMBER KYRK: I get it.

23 CHAIRMAN FOOTE: Okay. Well, thank you.

24 And the final *Item (No. 4) is motion to*
25 *adjourn* this meeting. Do I have a second?

1 MEMBER HAMMES: Second.

2 CHAIRMAN FOOTE: All in favor?

3 MEMBER KYRK: Aye.

4 MEMBER HAMMES: Aye.

5 CHAIRMAN FOOTE: The meeting is adjourned.

6 **(*The meeting was adjourned at 4:20 p.m. *)**

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1 C E R T I F I C A T I O N

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3 STATE OF NEW YORK)

4) SS:

5 COUNTY OF SUFFOLK)

6

7 I, ALISON MAHONEY, a Court Reporter and
8 Notary Public for and within the State of New
9 York, do hereby certify:

10 THAT, the above and foregoing contains a
11 true and correct transcription of the proceedings
12 taken on November 29, 2021, at Station One
13 Firehouse, Third & South Streets, Greenport,
14 NY, 11944.

15 I further certify that I am not related to
16 any of the parties to this action by blood or
17 marriage, and that I am in no way interested in
18 the outcome of this matter.

19 IN WITNESS WHEREOF, I have hereunto set my
20 hand this 2nd day of December, 2021.

21

22

23

Alison Mahoney

24

Alison Mahoney

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