

**Kostelanetz & Fink, LLP's Fact Sheet Regarding  
*Human Services Council of New York v. City of New York*, No. 21-cv-11149-PGG (S.D.N.Y.)  
May 4, 2022**

- Kostelanetz & Fink, LLP is representing HSC. K&F is not currently representing any HSC member in connection with the litigation.
- K&F's team:
  - Claude Millman – partner
  - Caroline Rule – partner
  - Usman Mohammad – counsel
  - Michelle Lee – associate
  - Destiny Reese – pre-law paralegal
- HSC's lawsuit is a federal civil action challenging the legality of Local Law 87 of 2001, the so-called "Labor Peace" statute.
- The lawsuit was filed on December 29, 2001. It is assigned to Judge Gardephe in Manhattan.
- The only defendant named is the City of New York.
  - The City is represented by Corporation Counsel – Rachel Kane and Michael Adler
- Much of HSC's Complaint focuses on HSC's claim that Local Law 87 is "preempted" by federal labor law, and is therefore unlawful under federal law.
- The City filed an Answer to the Complaint on February 11, 2022.
- HSC filed a motion for a preliminary injunction, seeking to block the enforcement of the law during the pendency of the lawsuit. The motion was fully-briefed on April 8, 2002. The parties are awaiting a decision from the Court.
- DC37 filed a motion for "permissive" intervention as a defendant in the case. The City did not oppose the motion; HSC opposed it. The motion was fully-briefed on April 8, 2002. The parties are awaiting a decision from the Court.
  - DC37 is represented by the Washington, DC, union-side labor law firm of Bredhoff & Kaiser
- The Court has scheduled a "preliminary conference" for May 19, 2002. This will be an in-person appearance in the federal courthouse in Manhattan.
- HSC and the City held their "Rule 26(f) conference" on April 28, 2002. The parties conferred about what schedule the Court should adopt after hearing the parties on May 19. Such a schedule would mainly set deadlines for "discovery" (the exchange of evidence and other information). The City asked for a schedule that is considerably slower than the pace normally allowed by the Court. HSC has asked for a schedule that is only 30 days longer than the schedule typically allowed by the Court.
- HSC has sent its first set of document demands to the City. The City's response is due on June 2, 2022. HSC is also permitted to issue "interrogatories" (seeking written answers to questions), requests for admissions, and subpoenas to non-parties, and take testimony at depositions.