



REQUEST FOR JUDICIAL INTERVENTION

New York Supreme COURT, COUNTY OF New York

Index No: 151246/2021

Date Index Issued: 02/09/2021

For Court Use Only:

CAPTION Enter the complete case caption. Do not use et al or et ano. If more space is needed, attach a caption rider sheet. Rafaela Espinal f/k/a Rafaela Espinal-Pacheo -against- New York City Department of Education, Richard Carranza Chancellor of the New York City Department of Education Individually, Cheryl Watson-Harris Former First Deputy Chancellor of the New York City Department of Education Individually, David Hay, Ursulina Ramriez New York City Department of Edu... Defendant(s)/Respondent(s)	IAS Entry Date
	Judge Assigned
	RJI Filed Date
	Plaintiff(s)/Petitioner(s)

NATURE OF ACTION OR PROCEEDING: Check only one box and specify where indicated.

COMMERCIAL

Business Entity (includes corporations, partnerships, LLCs, LLPs, etc.)

Contract

Insurance (where insurance company is a party, except arbitration)

UCC (includes sales and negotiable instruments)

Other Commercial (specify): _____

NOTE: For Commercial Division assignment requests pursuant to 22 NYCRR 202.70(d), complete and attach the **COMMERCIAL DIVISION RJI ADDENDUM (UCS-840C)**.

REAL PROPERTY: Specify how many properties the application includes: _____

Condemnation

Mortgage Foreclosure (specify): Residential Commercial

Property Address: _____

NOTE: For Mortgage Foreclosure actions involving a one to four-family, owner-occupied residential property or owner-occupied condominium, complete and attach the **FORECLOSURE RJI ADDENDUM (UCS-840F)**.

Tax Certiorari - Section: _____ Block: _____ Lot: _____

Tax Foreclosure

Other Real Property (specify): _____

OTHER MATTERS

Certificate of Incorporation/Dissolution [see **NOTE** in **COMMERCIAL** section]

Emergency Medical Treatment

Habeas Corpus

Local Court Appeal

Mechanic's Lien

Name Change

Pistol Permit Revocation Hearing

Sale or Finance of Religious/Not-for-Profit Property

Other (specify): _____

MATRIMONIAL

Contested

NOTE: If there are children under the age of 18, complete and attach the **MATRIMONIAL RJI Addendum (UCS-840M)**.

For Uncontested Matrimonial actions, use the Uncontested Divorce RJI (**UD-13**).

TORTS

Asbestos

Child Victims Act

Environmental (specify): _____

Medical, Dental, or Podiatric Malpractice

Motor Vehicle

Products Liability (specify): _____

Other Negligence (specify): _____

Other Professional Malpractice (specify): _____

Other Tort (specify): Discrimination

SPECIAL PROCEEDINGS

CPLR Article 75 (Arbitration) [see **NOTE** in **COMMERCIAL** section]

CPLR Article 78 (Body or Officer)

Election Law

Extreme Risk Protection Order

MHL Article 9.60 (Kendra's Law)

MHL Article 10 (Sex Offender Confinement-Initial)

MHL Article 10 (Sex Offender Confinement-Review)

MHL Article 81 (Guardianship)

Other Mental Hygiene (specify): _____

Other Special Proceeding (specify): _____

STATUS OF ACTION OR PROCEEDING: Answer YES or NO for every question and enter additional information where indicated.

	YES	NO	
Has a summons and complaint or summons with notice been filed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If yes, date filed: <u>02/03/2021</u>
Has a summons and complaint or summons with notice been served?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If yes, date served: <u>02/11/2021</u>
Is this action/proceeding being filed post-judgment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If yes, judgment date: _____

NATURE OF JUDICIAL INTERVENTION: Check one box only and enter additional information where indicated.

Infant's Compromise

Extreme Risk Protection Order Application

Note of Issue/Certificate of Readiness

Notice of Medical, Dental, or Podiatric Malpractice Date Issue Joined: _____

Notice of Motion Relief Requested: DISMISSAL Return Date: 05/28/2021

Notice of Petition Relief Requested: _____ Return Date: _____

Order to Show Cause Relief Requested: _____ Return Date: _____

Other Ex Parte Application Relief Requested: _____

Poor Person Application

Request for Preliminary Conference

Residential Mortgage Foreclosure Settlement Conference

Writ of Habeas Corpus

Other (specify): _____

RELATED CASES: List any related actions. For Matrimonial cases, list any related criminal or Family Court cases. If none, leave blank. If additional space is required, complete and attach the **RJI Addendum (UCS-840A)**.

Case Title	Index/Case Number	Court	Judge (if assigned)	Relationship to instant case

PARTIES: For parties without an attorney, check the "Un-Rep" box and enter the party's address, phone number and email in the space provided. If additional space is required, complete and attach the **RJI Addendum (UCS-840A)**.

Un-Rep	Parties	Attorneys and/or Unrepresented Litigants	Issue Joined	Insurance
<input type="checkbox"/>	Name: Espinal, Rafaela Role(s): Plaintiff/Petitioner	ISRAEL GOLDBERG, GOLDBERG & Markus PLLC, 14 Wall Street suite 2064 , New York, NY 10005, 2126973250, ig@grlawpllc.com	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: New York City Department of Education Role(s): Defendant/Respondent	NICHOLAS COLLINS, NEW YORK CITY LAW DEPARTMENT, 100 Church St , New York, NY 10007-2601, (212) 356-1000, nicollin@law.nyc.gov	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Carranza, Richard Role(s): Defendant/Respondent	NICHOLAS COLLINS, NEW YORK CITY LAW DEPARTMENT, 100 Church St , New York, NY 10007-2601, (212) 356-1000, nicollin@law.nyc.gov	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Watson-Harris, Cheryl Role(s): Defendant/Respondent	Nicholas Collins, New York City Law Department, 100 Church Street, New York, NY 10007, (646) 939-7622, nicollin@law.nyc.gov	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Hay, David Role(s): Defendant/Respondent	Nicholas Collins, New York City Law Department, 100 Church Street, New York , NY 10007, (646) 939-7622, nicollin@law.nyc.gov	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Ramriez, Ursulina Role(s): Defendant/Respondent	Nicholas Collins, New York City Law Department, 100 Church Avenue , New York , NY 10007, (646) 939-7622, nicollin@law.nyc.gov	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input checked="" type="checkbox"/>	Name: JOHN DOES 1-25 Role(s): Defendant/Respondent		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input checked="" type="checkbox"/>	Name: JANE DOES 1-25 Role(s): Defendant/Respondent		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	
<input type="checkbox"/>	Name: Role(s):		<input type="checkbox"/> YES <input type="checkbox"/> NO	

I AFFIRM UNDER THE PENALTY OF PERJURY THAT, UPON INFORMATION AND BELIEF, THERE ARE NO OTHER RELATED ACTIONS OR PROCEEDINGS, EXCEPT AS NOTED ABOVE, NOR HAS A REQUEST FOR JUDICIAL INTERVENTION BEEN PREVIOUSLY FILED IN THIS ACTION OR PROCEEDING.

Dated: 04/30/2021

NICHOLAS L. COLLINS

Signature

5271341

NICHOLAS L. COLLINS

Attorney Registration Number

Print Name

This form was generated by NYSCEF

[Empty box for Plaintiff/Petitioner(s) information]

Plaintiff(s)/Petitioner(s)

vs.

New York City Department of Education, Richard Carranza Chancellor of the New York City Department of Education Individually, Cheryl Watson-Harris Former First Deputy Chancellor of the New York City Department of Education Individually, David Hay, Ursulina Ramriez New York City Department of Education Chief Operating Officer Individually, JOHN DOES 1-25, JANE DOES 1-25

Defendant(s)/Respondent(s)