

4. Attached hereto as Exhibit B is a true and correct copy of Summary of Introduction Number 890-B.
5. Attached hereto as Exhibit C is a true and correct copy of the Committee Report of the Human Services Division, Committee on For-Hire Vehicles, dated April 30, 2018.
6. Attached hereto as Exhibit D is a true and correct copy of Introduction Number 890-B by Council Members Lander, Constantinides, Rivera, Powers, Chin, Ayala, Levin and Rosenthal, dated July 31, 2018.
7. Attached hereto as Exhibit E is a true and correct copy of Local Law No. 150, passed by the Council on August 8, 2018 and approved by the Mayor on August 14, 2018.
8. Attached hereto as Exhibit F is a true and correct copy of The City Record, Official Journal of The City of New York, dated August 28, 2018, containing a Notice of Public Hearing and Opportunity to Comment on Proposed Rules issued by the TLC.
9. Attached hereto as Exhibit G is a true and correct copy of the transcript of the New York City Taxi and Limousine Commission Meeting and Public Hearing, dated October 3, 2018.
10. Attached hereto as Exhibit H are true and correct copies of selected written comments to the New York City Taxi and Limousine Commission, obtained on November 28, 2018 through a FOIL Request.
11. Attached hereto as Exhibit I is a true and correct copy of The City Record, Official Journal of The City of New York, dated December 11, 2018, containing a Notice of Promulgation issued by the TLC.
12. Attached hereto as Exhibit J is a true and correct copy of the hearing transcript of the Taxi and Limousine Commission Board Meeting, dated April 6, 2017.

13. Attached hereto as Exhibit K is a true and correct copy of a report for the New York City Taxi and Limousine Commission by James A. Parrott and Michael Reich titled *An Earnings Standard for New York City's App-based Drivers: Economic Analysis and Policy Assessment*, dated July 2018.

14. Attached hereto as Exhibit L is a true and correct copy of an email from Ryan Wanttaja (TLC) to Josh Gold (Uber) et al., Utilization Rates (Dec. 21, 2018 5:01 P.M.).

15. Attached hereto as Exhibit M is a true and correct copy of New York City Taxi and Limousine Commission Industry Notice #19-2, dated January 11, 2019.

The Need for Immediate Relief

16. Petitioners bring this action to enjoin Respondents from enforcing the rule passed by the TLC on December 4, 2018 that establishes a minimum pay standard for certain For-Hire Vehicle drivers in New York City (the "Rule").

17. For the reasons set forth in the accompanying Affidavit of Ronen Ben David, Petitioners face immediate and irreparable injury unless this Court enjoins Respondents from enforcing the Rule pending a hearing and determination on the preliminary injunction.

18. The Rule was published in the City Record on December 11, 2018, and it will go into effect on February 1, 2019, absent action by this Court.

Notice to Respondents' Counsel

19. At approximately 4:30 p.m. on January 29, 2019, I provided notice to attorney Michelle Goldberg-Cahn at the New York City Law Department by phone that Petitioners intend to seek this relief.

20. No prior application has been made for the relief sought herein.

Dated: New York, New York
January 29, 2019



ALEXANDER C. DRYLEWSKI

PRINTING SPECIFICATIONS STATEMENT

1. Pursuant to N.Y.C.R.R. § 202.70(g), Rule 17, I hereby certify that the foregoing affirmation was prepared on a computer using Microsoft Word. A proportionally spaced typeface was used as follows:

Name of Typeface: Times New Roman
Point Size: 12
Line Spacing: Double

2. The total number of words in the foregoing affirmation, inclusive of point headings and exclusive of the caption, the signature block and the certificate of compliance is 687 words.

Dated: New York, New York
January 29, 2019

/s/ George A. Zimmerman