



**DEPARTMENT OF LAW**  
**OFFICE OF THE CORPORATION COUNSEL**  
**CITY OF SYRACUSE, MAYOR BEN WALSH**

October 18, 2022

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**SENT ELECTRONICALLY VIA CM/ECF**

Hon. Judge Glenn T. Suddaby  
Federal Building and U.S. Courthouse  
P.O. Box 7367  
Syracuse, NY 13261-7367

**Re: *Antonyuk, et al. v. Hochul, et al.***  
**Federal Civil Action No. 1:22-cv-00986 (GTS/CFH)**

Dear Judge Suddaby:

My office represents Defendant Syracuse Police Department Chief of Police Joseph Cecile ("Chief Cecile") in the above-referenced matter. In accordance with Your Honor's Text Order of October 12, 2022, Counsel for Chief Cecile provide the following letter in lieu of a list of witnesses and exhibits for the in-person hearing ("Hearing") regarding Plaintiffs' Motion for Preliminary Injunction ("Motion") on October 25, 2022.

Counsel for Chief Cecile do not intend to offer any witnesses at the Hearing in further support of our opposition to Plaintiffs' Motion.<sup>1</sup> Nor do we intend to offer any exhibits at the Hearing but rely upon those exhibits that are attached to Chief Cecile's opposition to Plaintiffs' Motion, including the Declaration of Julie LaFave, as being part of the record. See Dkt. Nos. 47-1 – 47-8.

We thank you for your consideration.

Respectfully submitted,  
/s/Todd M. Long  
Todd M. Long, Esq.  
Senior Assistant Corporation Counsel

CC: All counsel of record electronically via CM/ECF

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<sup>1</sup> We reserve the right to examine any witness listed on any of the parties' witness lists and elicit testimony from those witnesses relative to our opposition to the Motion.