

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
MARGARET HEALY,

plaintiff,

- against -

SLANEY O'HANLON and SUSAN McCARTHY,

defendants,
-----X

Index No.:

**AFFIRMATION OF
EMERGENCY**

THOMAS J. CHAVES, ESQ., an attorney duly admitted to practice law in the State of New York affirms under penalties of perjury that:

1. I am a Senior Trial Counsel for plaintiff's law firm Devereaux, Baumgarten and am fully familiar with all matters herein based on personal knowledge and review of the files maintained in our office.

2. I submit this emergent affirmation in support of the temporary restraining Order sought herein.


3. The facts and circumstances warranting the granting of a temporary restraining Order are fully set forth in the Verified Complaint.

4. The plaintiff and her husband are being viciously harassed, intimidated and threatened by defendants and will suffer irreparable injury unless the Order to Show Cause is granted and defendants are restrained and enjoined from contacting, coming near, threatening or harassing plaintiff and her husband pending the hearing sought herein.

5. No prior application for the relief sought herein has been made to this and/or any other Court.

WHEREFORE, plaintiff respectfully requests that the Court sign the Order to Show Cause and for such other and further relief as the Court deems just and proper.

Dated: September 22, 2011
New York, New York



Thomas J. Chaves, Esq.