

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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METROPOLITAN TRANSPORTATION AUTHORITY,  
and TRIBOROUGH BRIDGE AND TUNNEL  
AUTHORITY,

Plaintiffs,

Case No.: 1:25-cv-1413-LJL

RIDERS ALLIANCE, SIERRA CLUB, and THE NEW  
YORK STATE DEPARTMENT OF TRANSPORTATION,

**NOTICE OF MOTION TO  
INTERVENE – FED. R. CIV.  
P. 24**

Intervenor-Plaintiffs,

-against-

SEAN DUFFY, in his official capacity as Secretary of the  
United States Department of Transportation, GLORIA M.  
SHEPHERD, in her official capacity as Executive Director  
of the Federal Highway Administration, UNITED STATES  
DEPARTMENT OF TRANSPORTATION, and FEDERAL  
HIGHWAY ADMINISTRATION,

Defendants.

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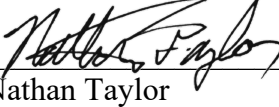
**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in support of its motion to intervene pursuant to Rule 24 of the Federal Rules of Civil Procedure, the proposed complaint, the undersigned will move this Court, at 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an Order granting the New York City Department of Transportation leave to intervene as a plaintiff. A copy of the New York City Department of Transportation's proposed complaint is annexed hereto as Exhibit A.

Dated: New York, NY  
April 2, 2024

Respectfully submitted,

**MURIEL GOODE-TRUFANT**

Corporation Counsel of the City of New York

By: 

Nathan Taylor

Assistant Corporation Counsel

ntaylor@law.nyc.gov

Christian C. Harned

Assistant Corporation Counsel

chharned@law.nyc.gov

100 Church Street

New York, New York 10007

(212) 356-2315

*Attorneys for the New York City Department of  
Transportation*