

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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FRIENDS OF THE EAST HAMPTON AIRPORT, INC.,  
ANALAR CORPORATION, ASSOCIATED AIRCRAFT  
GROUP, INC., ELEVENTH STREET AVIATION LLC,  
HELICOPTER ASSOCIATION INTERNATIONAL, INC.,  
HELIFLITE SHARES LLC, LIBERTY HELICOPTERS,  
INC., SOUND AIRCRAFT SERVICES, INC., and  
NATIONAL BUSINESS AVIATION ASSOCIATION, INC.,

No. 15 Civ. 2246 (JS) (ARL)

Plaintiffs,

-against-

THE TOWN OF EAST HAMPTON,

Defendant.

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**SUPPLEMENTAL DECLARATION OF CHRIS VELLIOS**

I, Chris Vellios, make the following declaration pursuant to 28 U.S.C. § 1746:

1. I am the Chief Operating Officer and Chief Financial Officer of Liberty Helicopters, Inc. (“Liberty”), one of the Plaintiffs in this action. I make this supplemental declaration, based upon personal knowledge, to respond to the Town’s opposition to our motion for a temporary restraining order.

2. The Town’s claim that Liberty will not be irreparably harmed by the Restrictions is untrue. Each week that the Restrictions are enforced translates to significant revenue for Liberty. Last year, from the Thursday before Memorial Day weekend through the Sunday after Memorial Day, flights to and from HTO accounted for nearly \$102,200 in revenue to Liberty. As the summer goes on, Liberty’s operations to and from HTO increase each week. If the Restrictions are not prevented, and assuming that Liberty is able to utilize all of its aircraft to make one trip per week to and from HTO, Liberty would suffer approximately \$400,000 in lost

revenue through the end of June. This is significant revenue for Liberty. Without it, Liberty may well have to lay off employees, including pilots, to cope with the losses.

3. In addition, if the Restrictions are enforced, Liberty will lose market share to a competitor, Gotham Air, which is already advertising that its fleet of Bell 407 helicopters is unaffected by the Restrictions.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed: May 12, 2015  
Kearny, New Jersey

  
Chris Vellios