

**JUDGE BATTS**  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**11 CIV 6026**

AMERICAN ATHEISTS, INC.; DENNIS  
HORVITZ; KENNETH BRONSTEIN;  
MARK PANZARINO; AND JANE  
EVERHART,

Plaintiffs,

v.

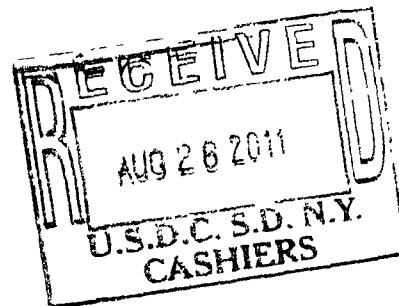
PORT AUTHORITY OF NEW YORK  
AND NEW JERSEY; STATE OF NEW  
JERSEY; GOVERNOR CHRIS  
CHRISTIE, in his official capacity;  
SILVERSTEIN PROPERTIES, INC.;  
LOWER MANHATTAN  
DEVELOPMENT CORPORATION;  
WORLD TRADE CENTER MEMORIAL  
FOUNDATION / NATIONAL  
SEPTEMBER 11 MEMORIAL AND  
MUSEUM; WORLD TRADE CENTER  
PROPERTIES, LLC; CHURCH OF THE  
HOLY NAME OF JESUS; AND BRIAN  
JORDAN,

Defendants.

No. 11 Civ. \_\_\_\_\_

*ECF Case*

Removed from the Supreme Court of the  
State of New York,  
Index No. 11-108670 (Hon. Richard F.  
Braun)



**RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1(a), the undersigned counsel for defendants World Trade Center Memorial Foundation / National September 11 Memorial and Museum<sup>1</sup> and Lower Manhattan Development Corporation state as follows:

<sup>1</sup> As stated in defendants' notice of removal which is being filed contemporaneously, plaintiffs have named "World Trade Center Memorial Foundation / National September 11 Memorial and Museum" as a defendant. Plaintiffs appear to be referring to the National September 11 Memorial & Museum at the World Trade Center Foundation, Inc. At the appropriate time, that defendant will petition the Court for an order that the pleadings reflect its correct name.

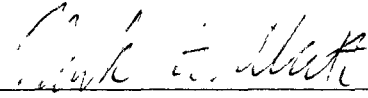
1. National September 11 Memorial & Museum at the World Trade Center Foundation, Inc. is a public charity registered under section 501(c)(3) of the Internal Revenue Code, 26 U.S.C. § 501(c)(3). National September 11 Memorial & Museum at the World Trade Center Foundation, Inc. has no parent corporation and no stock, meaning that there is no “publicly held corporation owning 10% or more of its stock” within the meaning of Federal Rule of Civil Procedure 7.1(a)(1).

2. Lower Manhattan Development Corporation is a subsidiary of the New York State Urban Development Corporation, doing business as Empire State Development. New York State Urban Development Corporation is a public benefit corporation of the State of New York.

Dated: New York, New York  
August 26, 2011

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

By: \_\_\_\_\_

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*Attorneys for Defendants National  
September 11 Memorial & Museum at the  
World Trade Center Foundation, Inc. and  
Lower Manhattan Development Corporation*