

1 GAYLE

2 A. Yes.

3 Q. Let's start with the nursing assistant
4 category.

5 Can you tell me all the places that you
6 can remember working as a nursing assistant, please?

7 A. Ocoee Health Care Center. That may not be
8 the complete, correct name.

9 Q. When did you work at Ocoee Medical Center?

10 A. '02 through '03.

11 Q. After Ocoee Medical Center, where else did
12 you work as a medical assistant?

13 A. Chief Rehab.

14 Q. What years?

15 A. I believe that was in 8/03 through 2/03.

16 Q. Do you mean 8/03 to 2/04?

17 A. '04, I'm sorry.

18 Q. Anywhere else where you worked as a
19 nursing assistant?

20 A. Park Manor Rehab.

21 Q. What years did you work at Park Manor
22 Rehab?

23 A. I think I worked there for several months.

24 It was in '04, I believe.

25 Q. Anywhere else as a nursing assistant?

1 GAYLE

2 A. No, that's it.

3 Q. Let's go to the LPN category.

4 Where have you worked as an LPN?

5 A. Kings Harbor Multi Care Center.

6 Q. What years did you work at Kings Harbor?

7 A. I believe I graduated in '04, or was it
8 '05? I think it was '05.

9 Q. When you say "graduate" --

10 A. I mean from BOCES, the summer of '05.

11 Q. Where else have you worked as an LPN?

12 A. I have worked at in -- I really don't
13 remember the place.

14 It's another facility in Georgia. I know
15 the name is Woodbury, but I don't remember the rest
16 of it.

17 MR. SILBERSTEIN: I'll leave a blank in
18 the transcript, and if you remember, you can
19 fill it in. Okay?

20 INSERT

21 MR. BERNSTEIN: Speaking of which -- I
22 don't mean to interrupt you -- we would like to
23 read and sign the transcript.

24 MR. SILBERSTEIN: That's fine.

25 Q. I'll call it the Woodbury facility, okay?

1 GAYLE

2 That's in Georgia?

3 A. That's in Georgia.

4 Q. Were you an LPN there?

5 A. Yes.

6 Q. What years?

7 A. I just worked there for three weeks I

8 believe or four weeks.

9 Q. Where else as an LPN?

10 A. I worked here in New York with Harry's
11 Nurses Registry.

12 Q. Do you remember the dates that you work
13 for Harry's?

14 A. I think it was from February through the
15 date when he got served with the petition, when he
16 told his employees not to hire me anymore, not to
17 give me any more jobs.

18 Q. So it's February of '07?

19 A. Yes, through November of '07.

20 Q. Anywhere else as an LPN?

21 A. I just work right now with another agency.

22 Q. What is the name of that agency?

23 A. White Glove.

24 Q. What dates have you worked with White
25 Glove?

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A. I have worked with White Glove on and off since September of 2006.

MR. SILBERSTEIN: Let the record reflect that the witness has conferred with her counsel.

(Defendants' Exhibit D-1, resume, was marked for identification as of this date.)

Q. Ms. Gayle, I show you a document that's been marked as Exhibit D-1.

I'm going to ask you to take a look at that and then I'm going to ask you some questions about it.

A. I completely forget about Kenneth.

Q. I'm sorry. I didn't catch what you said.

A. I was just verbalizing my thoughts.

Q. Can you tell me what you said?

A. I was saying that I completely forgot that I worked as an realtor.

Q. Is this your resume?

A. Yes, it is.

Q. Is this your most current resume?

A. I would say it's not updated.

Q. Have you updated this resume at any time -- I'll note that at the top, at "employment" it

1 GAYLE

2 says, "8/05 to the present, Kings Harbor Multicare
3 Center."

4 Do you see that?

5 A. Yes, sir.

6 Q. Do you have any updated resumes that
7 reflect employment after Kings Harbor?

8 A. No, sir.

9 Q. I'd like you to take a look at the
10 employment that's listed here and tell me if there
11 is anything on the resume -- withdrawn.

12 Can you tell me if there are any employers
13 or places that you've worked that are not reflected
14 on the resume?

15 A. Kenneth Moxey Realty. I honestly forgot
16 about that one.

17 Q. Kenneth Moxley Realty?

18 A. Kenneth Moxey Realty, Inc.

19 MR. BERNSTEIN: I think you may have
20 misunderstood the question.

21 The question is did you have any jobs that
22 aren't listed on this resume.

23 MR. SILBERSTEIN: Thank you.

24 THE WITNESS: Okay, I'm sorry.

25 A. No.

1 GAYLE

2 Q. Well, this resume doesn't reflect, for
3 example, Harry's Nurses or White Glove Agency,
4 correct?

5 A. Correct.

6 Q. What I'm asking is, obviously it doesn't
7 reflect Harry's Nurses or White Glove. Are there
8 any employers that you've had up to the present that
9 are not reflected by this resume?

10 A. No, not that I can remember.

11 Q. Let's start with the Ocoee Health Care
12 Center. Do you see that on the resume, 8/02 to
13 6/03?

14 A. Mm-hm.

15 Q. Yes?

16 A. Yes.

17 Q. Can you tell me exactly what you did
18 there, please?

19 A. It is specified on the resume.

20 Q. That you were a certified nursing
21 assistant?

22 A. Yes.

23 Q. How were you paid by Ocoee Health Care
24 Center?

25 MR. BERNSTEIN: Objection. You can

1 GAYLE

2 answer.

3 A. As an employee.

4 Q. With a W-2?

5 A. With a W-2.

6 Q. Have you produced that W-2 in connection
7 with this action?

8 A. I don't know if I have because it's been a
9 while. I'm not exactly sure what I've given to Mr.
10 Bernstein.

11 MR. SILBERSTEIN: We've called for the
12 production of all the W-2s and 1099s to the
13 extent that they exist.

14 I am going to reiterate, for the record,
15 my request for those documents.

16 MR. BERNSTEIN: I'll take it under
17 advisement.

18 Q. Let's go to the next one up from that, the
19 Achieve Rehab and Nursing Facility.

20 A. Mm-hm.

21 Q. You were a certified nursing assistant
22 there, as well?

23 A. Yes.

24 Q. How were you paid, on a 1099 or on a W-2?

25 A. W-2.

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Q. Have you produced those W-2s?

A. I am not exactly sure what I have produced.

MR. SILBERSTEIN: I call for the production of those W-2s.

MR. BERNSTEIN: I will take it under advisement.

Q. The next one, Park Manor Rehabilitation Center, were you a certified nursing assistant there, as well, correct?

A. Yes.

Q. Were you paid on a 1099 or on a W-2?

A. W-2.

Q. King Harbor Multicare Center, that is the first place that you worked as an LPN; is that correct?

A. That is correct.

Q. Were you paid with a W-2 or with a 1099 at Kings Harbor?

A. W-2.

MR. SILBERSTEIN: I call for the production of those W-2s.

Q. You had mentioned a Woodbury facility in Georgia.

1 GAYLE

2 That's not on this resume, correct?

3 A. Correct.

4 Q. Did you work as an LPN there?

5 A. Yes, sir.

6 Q. Were you paid on a 1099 or with a W-2?

7 A. W-2.

8 MR. SILBERSTEIN: I call for the
9 production of those W-2s.

10 Q. Harry's Nurses is not reflected on here
11 either, correct?

12 A. Correct.

13 Q. Were you paid on a 1099 or with a W-2 at
14 Harry's Nurses?

15 A. I received a 1099.

16 Q. White Glove Agency that you mentioned, how
17 are you paid through White Glove?

18 A. W-2.

19 MR. SILBERSTEIN: I call for the
20 production of those W-2s.

21 MR. BERNSTEIN: I believe that was
22 produced for 2006 and I believe my client's tax
23 preparer is trying to locate the 2007 W-2s.

24 That will be faxed directly to your office,

25 2007.

1 GAYLE

2 Q. Let's go back to your education while we
3 have the resume in front of us. Okay?

4 A. Mm-hm.

5 Q. You mentioned Excelsior College in Albany,
6 New York?

7 A. Mm-hm, yes.

8 Q. Did you mention that to me before when we
9 were going through your educational background?

10 A. No.

11 Q. How long did you attend Excelsior College?

12 A. Read what it says.

13 Q. It says, "Currently registered and
14 accepted to commence AS in Nursing."

15 Is that what it says?

16 A. Yes, sir.

17 Q. You are taking classes at Excelsior?

18 A. No, I'm not.

19 Q. Did you ever take classes at Excelsior?

20 A. No, I've never.

21 Q. So you were accepted but you never
22 attended?

23 A. Exactly.

24 Q. When you mentioned the school in Orlando,
25 was that the Florida Hospital College of Health and

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Sciences?

A. As it states, yes.

(Defendants' Exhibit D-2, copy of application, was marked for identification as of this date.)

Q. Ms. Gayle, I show you a series of documents that have been collectively marked as Exhibit D-2.

I'm going to ask you to take a moment to review those documents and let me know when you're finish.

A. Okay.

MR. SILBERSTEIN: The documents that have been marked as Exhibit D-2 is a series of four Bates-stamped documents, D-1 through D-4, produced during discovery of this action. It's labeled "Application For Employment."

Q. Did you complete this form, Ms. Gayle?

A. I believe I did.

Q. I'll just refer you to the last page of the exhibit. There is a signature line and a date.

Is that your signature?

A. That appears to be.

Q. On the first page there is a photograph.

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GAYLE

Is that your photograph?

A. I'm not sure.

Q. What does that mean?

A. Meaning that it doesn't look like me.

Q. It doesn't, right?

A. No.

Q. Is that the document that you submitted to Harry's in connection with your application for employment?

A. I cannot answer this with a yes or no.

Q. Why not?

A. Because I do not trust your client and anything could have been modified after giving this to him.

Q. Did you submit an application for employment to Harry's Nurses Registry?

A. Yes, I did.

Q. Was part of that application a request that you submit a current photograph of yourself?

A. Yes.

Q. You did submit a photograph to Harry's Nurses --

A. Yes, I did.

Q. Wait until I'm done with the question.

1 GAYLE

2 Sitting here today you are saying that you
3 don't remember whether the photograph that is on the
4 top of the first page of D-2 is the photograph that
5 you actually submitted to Harry's Nurses?

6 A. I did not say that I don't remember.
7 Those were not my words.

8 Q. Why don't you clarify what you meant?

9 A. Exactly what I said is, you asked me if
10 that is a photograph of myself --

11 MR. BERNSTEIN: Take it easy. Just
12 clarify your testimony.

13 A. I did give a photograph. This is a copy
14 of some photograph.

15 You are asking me if that's me and I'm
16 telling you, looking at this copy, it doesn't look
17 like me. That's what I'm saying. I don't believe I
18 look like what's on here.

19 Q. Do you have a copy of the photograph that
20 you submitted to Harry's Nurses Registry in
21 connection with your application for employment?

22 A. I believe I do.

23 MR. SILBERSTEIN: I call for production of
24 that photograph.

25 THE WITNESS: I don't have it on my

1 GAYLE

2 person.

3 MR. SILBERSTEIN: I call for production of
4 it.

5 MR. BERNSTEIN: "Call" is directed to me.
6 If you would follow it up in writing, I
7 would appreciate it.

8 MR. SILBERSTEIN: I'll send you a letter
9 after we are done here today.

10 MR. BERNSTEIN: Thank you.

11 MR. SILBERSTEIN: Off the record.

12 (Discussion held off the record.)

13 MR. SILBERSTEIN: We are back on the
14 record.

15 This is the original application for
16 employment completed by Ms. Gayle. The
17 document that we have marked as D-2 is a
18 photocopy of this but this actually has the
19 original photograph taped across the front of
20 the page.

21 (Defendants' Exhibit D-3, original
22 application, was marked for identification as
23 of this date.)

24 Q. Ms. Gayle, you now have in front of you
25 the original application submitted in connection

1 GAYLE

2 with your employment with Harry's Nurses Registry.
3 There is a color photograph taped on the front of
4 that page.

5 Is that the photograph that you submitted
6 to the company?

7 A. I believe it is.

8 Q. Is that you?

9 A. It looks like me.

10 Q. The original looks like you but the
11 photocopy does not?

12 A. That is what I'm saying.

13 Q. You've completed this application -- I
14 refer you to D-2 now -- use the photocopy -- on
15 February 20, 2007; is that correct?

16 A. The exact date I'm not sure of.

17 Q. Did you complete that date on the
18 application? Is that your handwriting?

19 A. I did complete an application at Harry's
20 Nurses Registry, Inc.

21 Q. Is that your handwriting on the
22 application?

23 A. It appears to be.

24 Q. You wrote "2/20/07," right?

25 A. I don't know.

1 GAYLE

2 Q. Who else completed that application?

3 A. Sir, like I said, I don't know if my
4 application has been modified. I do not trust your
5 client.

6 Q. Take Exhibit D-3, which is the original.
7 Look at that one.

8 Is that your handwriting?

9 A. It appears to be.

10 Q. Did you write "2/20/07"?

11 A. Maybe, maybe not.

12 Q. What does that mean?

13 A. As it is, simple, maybe, maybe not.

14 Q. You may have completed the application,
15 you may not have?

16 A. I have completed an application at Harry's
17 Nurses Registry, Inc.

18 Q. Is that the original application with your
19 color photograph sitting in front of you marked as
20 Exhibit D-3?

21 A. Like I said before -- I have answered your
22 question before. I don't think I need to answer it
23 again.

24 Q. That's up to your attorney to decide. I'm
25 going to ask you the question.

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GAYLE

If you don't want to answer it, we will mark it for a ruling.

Can you read back the question, please?

And if you want to get out of here earlier today, you are not doing a good job because I will sit here all day and do this with you.

A. Can you ask me the question again?

MR. BERSTEIN: Off the record.

(Testimony was read back.)

Q. Do you want to change your answer to the question?

A. Would you ask your question again?

MR. SILBERSTEIN: Can you read the question back, please?

(Testimony was read back.)

A. What was the question? She read a lot of stuff.

My question is now what was the question and I'll answer the question.

Q. Did you write "2/20/07" on that application?

A. It's possible.

Q. Did anybody else -- you have the original in front of you -- complete any portion of the

GAYLE

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2 application?

3

A. No, I completed it by myself, if this is
4 the original.

5

Q. Are you saying that it's not the original?
6 Take a look at it.

7

Do you have any reason, sitting here
8 today, to believe that the document that's been
9 marked as Exhibit D-3 is not the original
10 application that you submitted to Harry's Nurses
11 Registry?

12

A. I don't have an answer for you.

13

Q. You can't answer the question? Okay.

14

Why can't you answer the question?

15

A. I think it's a stupid question.

16

MR. SILBERSTEIN: Mark for the record that
17 she said that she thinks it's a stupid
18 question.

19

MR. BERNSTEIN: I can't talk to you while
20 there is a question pending.

21

A. I think I've already answered the
22 question. I told you that it appears to be my
23 handwriting and it's possible, whatever is on it --
24 no one has completed the application but me.

25

Q. Take a look at the third page of the

1 GAYLE

2 application, please.

3 You see at the top where it says, "White
4 Glove Placement"?

5 A. Yes.

6 Q. If you've listed White Glove Placement as
7 your employer at the time you submitted this
8 application, why is White Glove Placement not listed
9 on the resume that you submitted to Harry's Nurses,
10 which is Exhibit D-1?

11 MR. BERNSTEIN: Objection. You can
12 answer.

13 A. Because that resume had been completed --
14 when was the last time I did this resume? I did
15 this resume way before I seek employment with
16 Harry's, before I started working with White Glove.

17 This is the same resume that I submitted
18 to White Glove.

19 Q. Your testimony is that you had just not
20 updated your resume at the time you applied for work
21 at Harry's --

22 A. That's correct.

23 Q. -- Nurses?

24 MR. BERNSTEIN: Let him ask the entire
25 question before you answer, because otherwise

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it's difficult for the reporter to do her job.

3

(Defendants' Exhibit D-4, letter, was

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marked for identification as of this date.)

5

Q. I show you a document that's been marked
6 as Exhibit D-4. Take a moment to look at that and
7 then I'll ask you some questions about it.

8

Have you ever seen the document marked as
9 D-4 before?

10

A. No.

11

Q. You've never seen this document?

12

A. No, I believe -- I don't think so. I
13 believe it might have been faxed directly to Harry's
14 from White Glove.

15

Q. Take a look at the top of the document and
16 the date. It says, "February 20, 2007," correct?
17 Do you see that?

18

A. Mm-hm.

19

Q. That's the same date of your application
20 to Harry's Nurses, correct?

21

A. Okay.

22

Q. Was this submitted by you in connection
23 with your application for employment at Harry's?

24

MR. BERNSTEIN: Objection. You can

25

answer.

1 GAYLE

2 A. I don't remember submitting it to Harry's.

3 Q. It may have happened, you just don't
4 remember?

5 It says that your current rate of pay at
6 White Glove is \$28.50 per hour, correct?

7 A. At the time.

8 Q. What is it now?

9 A. Twenty-eight dollars.

10 Q. It's gone down?

11 A. It depends on what institution they send
12 you to. Each institution pays a different rate.

13 Q. I see.

14 You testified earlier that you were always
15 paid -- that you are currently being paid as a W-2
16 employee by White Glove; is that correct?

17 A. Yes.

18 Q. Is there any point in time that you've
19 ever received a 1099 from White Glove?

20 MR. BERNSTEIN: Objection. You can
21 answer.

22 A. No.

23 Q. Can you explain to me the process by which
24 the rate of pay differs from the institutions or the
25 places where you work through White Glove?

1 GAYLE

2 MR. BERNSTEIN: Objection. You can
3 answer.

4 A. No, I can't explain it.

5 Q. Well, you were making \$28.50 per hour as
6 of February 20, 2007.

7 Who was paying you \$28.50 per hour?

8 A. White Glove.

9 Q. For working where?

10 A. It depends on what facility they send you
11 to. They have different facilities. It depends on
12 what their contract was. That's my assumption.

13 Q. Where were you working on February 2007
14 for White Glove?

15 A. Possibly in that nursing home in The
16 Bronx.

17 Q. What's the name of that?

18 A. There are so many nursing homes. I really
19 don't remember the exact one.

20 Q. Where are you working through White Glove
21 today?

22 A. A nursing home in The Bronx.

23 Q. But the rate of pay is different through
24 the current nursing home than the prior nursing
25 home?

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A. I'm not paid by the nursing home. I am paid by White Glove.

Q. I am asking for an explanation as to why the rate of pay differs depending on where you work?

A. That I can't answer you. You'd have to ask White Glove directly, to be honest with you.

Q. They place you somewhere and tell you what the rate of pay is?

A. Exactly.

Q. Depending on the institution it could be higher or lower?

A. That's my belief. That's what I've been told.

Q. Your testimony is that irrespective of the institution you are always paid on a W-2?

MR. BERNSTEIN: Objection.

A. Restate your question, please.

Q. I want to clarify for the record if it's your testimony that irrespective of the institution where you are working for White Glove, you are always paid on a W-2?

A. Yes.

Q. Have all of the placements that you've held through White Glove been for LPN services?

1 GAYLE

2 A. Yes.

3 Q. Have you ever done any other work for
4 White Glove other than LPN?

5 A. No.

6 Q. We noted earlier that the date of the
7 White Glove placement letter is February 20, '07 and
8 that's the same date that's on the top of the
9 application which is Exhibit D-2.

10 My question is, after you were put on the
11 Harry's Nurses Registry, did you continue to work
12 for White Glove?

13 A. No.

14 Q. No?

15 A. No.

16 MR. BERNSTEIN: Just to clarify, what time
17 period are you talking about?

18 Q. After you submitted this application in
19 February 2007 to Harry's Nurses Registry, how long
20 was it before you went on the Harry's Nurses
21 Registry?

22 A. I'm not sure. I probably started with
23 them maybe a few days after. After I did the
24 application with Harry's, I probably had a case a
25 few days after, after submitting the application.

GAYLE

1
2 A. No. Explain it to me.

3 Q. Have you ever heard the phrase "nurses
4 registry" before?

5 A. Sure.

6 Q. Tell me what your understanding of a
7 nurses registry is.

8 A. Why don't you tell me what you mean?

9 Q. I'm asking the questions here. I am not
10 here to answer questions.

11 I asked you if you knew what a nurses
12 registry was, you said you were familiar with the
13 term. I'm asking for your understanding of what a
14 nurses registry is?

15 A. I don't have an understanding.

16 Q. You don't?

17 A. No.

18 Q. But you've heard the term?

19 A. Yes.

20 Q. Tell me what type of organization White
21 Glove Placement, Inc. is then.

22 A. It's a nurses agency.

23 Q. Okay.

24 A. Any further explanation you would have to
25 call White Glove.

1 GAYLE

2 Q. You've been working with White Glove from
3 September 2006 to the present, correct?

4 A. Yes.

5 Q. And you tell me it's a nurses agency?

6 A. Yes.

7 Q. Is a nurses agency different than a nurses
8 registry?

9 MR. BERNSTEIN: Objection.

10 A. I guess it's just a play on words.

11 Q. What is a nurses agency?

12 A. Sir, I do not incorporate -- I do not do
13 anything legal where business are concerned so you
14 would have to check that one out.

15 MR. BERNSTEIN: Ms. Gayle, I have already
16 objected and all that is balled up in the
17 objection I gave.

18 It's perfectly acceptable for you to say
19 what you understand by "nurses agency."

20 A. I understand that, but I'm saying I don't
21 really have -- to me it's a play on words. You
22 could call it any way you want, Placement, Inc.,
23 Nurses Registry. That's what I'm saying. That's my
24 understanding.

25 Q. I am asking you for your understanding of

1 GAYLE

2 what a nurses agency is.

3 A. An agency, a company that employs nurses
4 to go to different facilities to work.

5 Q. Is that what White Glove Placement, Inc.
6 is?

7 A. That's what I understand it to be.

8 Q. Is that what you've been doing there from
9 September 2006 to the present, May 2008?

10 A. There are periods of time when I did not
11 take assignment from White Glove Placement, Inc.

12 Q. Have you ever removed your name from the
13 White Glove agency at any time from September 2006
14 to the present?

15 A. No.

16 Q. Take a look at the address at the top of
17 the page.

18 Is White Glove Placement, Inc. located in
19 Brooklyn?

20 A. That's what it says.

21 Q. Do you know that to be true?

22 A. I've never been there.

23 Q. How are you paid through White Glove?

24 A. Direct deposit.

25 Q. What about, when you interviewed with White

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GAYLE

Glove?

A. They have satellite offices.

Q. Which satellite office do you use?

A. Like branches.

Q. Yes.

A. Right.

Q. Which one did you use?

A. I went to the one in The Bronx.

Q. As of February 20, 2007, at the time you submitted this application to Harry's Nurses, your testimony is that you were working through White Glove at a nursing facility in The Bronx, correct?

A. Yes.

Q. Take a look at the application, please, it's Exhibit D-2. You can look at the original one, if you want, that's D-3.

You listed an address in Covington, Georgia. Why is that?

A. Because it's my home.

Q. Did you maintain another address at the time you submitted this application?

~~A.~~ A. What do you mean if I maintained another address?

~~Q.~~ Q. Were you commuting from Georgia every day

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GAYLE

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up to The Bronx?

3

MR. BERNSTEIN: Objection.

4

MR. SILBERSTEIN: Let record reflect that
the witness is closing her eyes, grimacing,
making faces at me.

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It's a very simple question.

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MR. BERNSTEIN: She is looking down at the
document, Mr. Silberstein. From where you're
sitting it might look like she is closing her
eyes and grimacing.

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MR. SILBERSTEIN: I think that the
witness's behavior today has been
uncooperative. She is the plaintiff in this
case.

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She told me she wants to get out of here
early today. She is being difficult in
answering the questions. And, quite frankly,
her mannerisms are not going to be reflected
for the record unless I point them out.

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It's a simple question. Did you commute
up from Georgia every day to The Bronx or were
you living up here?

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A. I stay in New York.

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Q. Where?