

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

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ORAL CLARKE, ROMANCE REED, GRACE PEREZ,  
PETER RAMON, ERNEST TIRADO, and DOROTHY  
FLOURNOY

Index No. EF002460-2024

Plaintiffs,

(Mot. Seq. 001)

-against-

**AFFIRMATION OF  
BENNET J. MOSKOWITZ**

TOWN OF NEWBURGH and TOWN BOARD OF THE  
TOWN OF NEWBURGH,

Defendants.

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BENNET J. MOSKOWITZ, an attorney duly admitted to practice before the Courts of the  
State of New York, hereby affirms the following under penalty of perjury:

1. I am a Partner at Troutman Pepper Hamilton Sanders LLP, counsel for Defendants  
Town of Newburgh and Town Board of the Town of Newburgh.


2. I submit this Affirmation solely to present to the Court certain materials cited in  
Defendants' Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiffs'  
Verified Complaint, which materials are attached hereto as described below.

3. Attached hereto as Exhibit 1 is a copy of Plaintiffs' Summons and Complaint and  
Exhibits A and B thereto (NYSCEF Nos. 1, 2, 3).

Dated: New York, New York  
April 16, 2024

Respectfully submitted,

**TROUTMAN PEPPER HAMILTON  
SANDERS LLP**



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Bennet J. Moskowitz  
875 Third Avenue  
New York, New York 10022  
(212) 704-6000

Misha Tseytlin  
227 West Monroe Street  
Suite 3900  
Chicago, Illinois 60606  
(608) 999-1240

*Attorneys for Defendants Town of Newburgh  
and Town Board of the Town of Newburgh*

**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing Affirmation complies with the word count limitations set forth in Uniform Rule 202.8-b for the Supreme Court. This Affirmation uses Times New Roman 12-point typeface and contains 113 words, excluding parts of the document exempted by Rule 202.8-b. As permitted, the undersigned has relied on the word count feature of this word-processing program.

By: 

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Bennet J. Moskowitz