

Exhibit C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ORANGE

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

Plaintiffs,

– against –

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

Defendants.

Index No. EF002460-2024

**PLAINTIFF ROMANCE REED'S
RESPONSES TO DEPOSITION
ON WRITTEN QUESTIONS**

Plaintiff Romance Reed (“Plaintiff”) submits these Responses to the Deposition on Written Questions of Defendants Town of Newburgh (the “Town”) and the Town Board of the Town of Newburgh (the “Town Board,” and, collectively with the Town, “Defendants”), served upon counsel for the Plaintiffs on September 11, 2024.

RESERVATION OF RIGHTS

1. The Responses made herein are based on Plaintiff’s knowledge as of the date of this response. Plaintiff reserves the right to amend or supplement these Responses with additional information that may become available or come to his attention, and to rely upon such information in any hearing, trial, or other proceeding in this litigation in accordance with the applicable New York Civil Practice Law and Rules (“CPLR”), the Local Civil Rules and Orders of this Court. By this reservation, Plaintiff does not, however, assume a continuing responsibility to update these Responses beyond the requirements of the applicable CPLR, the Local Civil Rules and Orders of this Court.

2. These Responses are made without in any way waiving or intending to waive: (i) any objections as to the competency, authenticity, relevancy, materiality, privilege, or admissibility as evidence, for any purpose, of information produced in response to these questions; (ii) the right

to object on any ground to the use of the information provided in response to the questions for any purposes, including at any hearings or at trial; (iii) the right to object on any ground at any time to a request for further responses to the questions; or (iv) the right at any time to revise, correct, add to, supplement, or clarify any of the objections contained herein, all of which objections and rights are expressly reserved.

3. These Responses are supplied for use in this lawsuit and for no other purpose and are supplied subject to that limitation. Any information provided by Plaintiff in response to these questions is provided without conceding the information's relevance, admissibility, authenticity, or probative value. Plaintiff reserves the right to object to the use, competency, relevancy, materiality, or admissibility of any of these responses at trial or any other proceedings, as Plaintiff deems necessary and appropriate. Unless otherwise stated, Plaintiff responds to the following questions according to his interpretation and definition of the terms and phrases used in the questions.

4. A response to a question stating objections shall not be deemed or construed to mean that Plaintiff has responsive information; knew about or performed any of the acts described in the question or definitions or instructions applicable to the questions; or agrees with the characterization of the conduct or activities described in the question or definitions or instructions applicable to the question. Provision of the information contained herein is not intended to imply that such information is in the possession, custody, or control of Plaintiff.

RESPONSES TO DEPOSITION QUESTIONS

1. How long have you lived in the Town of Newburgh?

Response: I have been a resident of the Town of Newburgh since October 2017.

2. How did you identify your race on the 2020 census?

Response: I do not specifically recall filling out the 2020 census, but typically I identify my race as Black or African American.

3. How many local elections have you voted in?

Response: Since I have lived in the Town of Newburgh, I have voted in all municipal elections.

4. With which political groups are you associated?

Response: I am registered with the Democratic Party.

5. For which candidates have you volunteered or assisted with local elections in the Town of Newburgh?

Response: I have not specifically volunteered for or assisted candidates in the Town of Newburgh. However, I have served as campaign manager for Torrence Harvey, Mayor of the City of Newburgh.

6. Did you ever speak or testify at a Town Hall meeting?

Response: No.

a. What was the content of your testimony?

Response: Not applicable.

b. How did the Town Board respond to your testimony?

Response: Not applicable.

7. Have you ever voiced concerns or expressed opinions to any members of Town government?

Response: I do not recall formally voicing concerns to the Town government.

a. What were those concerns?

Response: Not applicable.

b. What was the response to those concerns?

Response: Not applicable.

8. Do you know of any individuals in the Town's Black community who have voiced concerns to the Town Board?

Response: Yes, Mary Mclymore.

a. What were their concerns?

Response: I do not know what particular concerns she voiced.

b. What was the Town Board's response?

Response: I do not know what the Town Board's response was.

9. Do you know of any individuals in the Town's Hispanic community who have voiced concerns to the Town Board?

Response: No.

a. What were their concerns?

Response: Not applicable.

b. What was the Town Board's response?

Response: Not applicable.

10. Paragraph 122 of the Complaint states: "The Town Board has shown little regard for the particularized concerns of the Black or Hispanic communities." What facts are you aware of that support, contradict or otherwise concern those allegations?

Response: During my time living in Newburgh, I have noticed that the Town government does not appear to recognize or promote events of importance to the Black and Hispanic communities. For instance, to my knowledge, neither the Town nor its police formally recognize Juneteenth, a significant day for the Black community.

11. Paragraph 82 of the Complaint states: "There is a long history of discrimination against the Black and Hispanic communities in the Town." What facts are you aware of that support, contradict or otherwise concern those allegations?

Response: My own experiences underscore the challenges that people of color still face. In 2021, when my vehicle was stolen from my driveway, I asked the Town of Newburgh Police for assistance. I felt that the level of care I received both from the officers handling the case and the dispatchers were inadequate, and I felt that my own race may have played a role. For example, when I expressed my frustrations to a dispatcher, they suggested that I should contact the state police instead if I was not satisfied with the Newburgh Police's response. Although I requested recordings of my conversations with dispatch, I never received a response. The police chief apologized to me for the situation.

12. Paragraph 72 of the Complaint states: "Black and Hispanic voters in the Town of Newburgh are also politically cohesive with each other." What facts are you aware of that support, contradict or otherwise concern those allegations?

Response: Plaintiff objects to this question to the extent that it requires expertise which he does not possess.

Subject to and without waiving that objection, Plaintiff responds: Based on my observations and interactions with other residents of the Town of Newburgh, Black and Hispanic residents share common beliefs that the Town government ignores their concerns.

I affirm this 23rd day of September, 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

/s/ Romance Reed
ROMANCE REED