

EXHIBIT L

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,

Index No.: EF002460-2024

v.

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

Defendants.

**DEFENDANTS TOWN OF NEWBURGH AND TOWN BOARD OF THE TOWN
OF NEWBURGH'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF INTERROGATORIES**

Defendants Town of Newburgh ("Town") and Town Board of the Town of Newburgh ("Town Board") (with Town, the "Defendants"), by their attorneys, Troutman Pepper Hamilton Sanders LLP, as and for their supplemental responses to Plaintiffs' First Set of Interrogatories (the "Interrogatories," and each an "Interrogatory"), respond and object as follows:

GENERAL RESPONSES AND OBJECTIONS

Defendants incorporate by reference those General Responses and Objections set forth in Defendants' Responses and Objections to Plaintiffs' First Set of Interrogatories served on July 1, 2024, as if fully set forth herein.

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Defendants reserve the right to correct, supplement and amend any and all of their responses to the Interrogatories.

RESPONSES TO INTERROGATORIES

4. Please identify any action, proceeding, lawsuit, EEOC claim, New York State Division of Human Rights complaint, or Orange County Human Rights Commission complaint, noticed or filed against Newburgh, its officers or employees, including members of the Town Board, in their official capacities from 2010 to the present that alleged or concerned discrimination based on race, ethnicity, national origin or language.

RESPONSE:

Defendants object to this Interrogatory on the grounds and to the extent that the information it seeks is already within the possession, custody, and/or control of Plaintiffs or is publicly available to Plaintiffs. Subject to and without waiving the foregoing and General Objections, Defendants identify *Gray v. Elliot et al.*, Case No. 7:12-cv-07880-CS (S.D.N.Y. 2012); *McCray v. County of Orange et al.*, Case No. 12-cv-3950-CS (S.D.N.Y. 2012); *Martinez v. Town of Newburgh et al.*, Case No. 7:14-cv-03051-CS (S.D.N.Y. 2014).

5. Please identify each person elected by the voters of Newburgh to any position in Newburgh's government or appointed to the Town Board or any Newburgh Board, Committee or Council (including any advisory Board, Committee or Council) including, without limitation, those listed at www.townofnewburgh.org/cn/departments/?tpid=4723 and those identified in the Newburgh Town Code, from 2003 to the present, and indicate the person's title, race, ethnicity, national origin, language, political party enrollment, if any, date of appointment, and date of termination.

RESPONSE:

Defendants object to this Interrogatory on the grounds that it is overbroad and unduly burdensome. Defendants also object to this Interrogatory on the grounds and to the extent that the information it seeks is already within the possession, custody, and/or control of Plaintiffs or is publicly available to Plaintiffs. Subject to and without waiving the foregoing or the General Objections, Defendants identify the following:

<u>Town of Newburgh Planning Board</u>		
Name	Title	Year
John P. Ewasutyn	Chairperson	2003-present
Kenneth A. Mennerich	Vice Chairman	2003
	Member	2004-2024
Gilbert J. Piaquadio	Member	2003
J. Leo Glynn	Member	2003-2007
Edward T. O'Donnell Jr.	Member	2003-2007
Clifford C. Browne	Member	2003-2021; 2023- present
James Winslow	Member	(July) 2004
Frank Galli	Member	(April) 2004-(November) 2023
Joseph E. Profaci	Member	2005-2010; 2012-2015
Thomas P. Fogarty	Member	2009-2013
John A. Ward	Member	2009-2024
David Dominick	Member	(May) 2014-present
Stephanie DeLuca	Member	(February) 2017-present
<u>Town of Newburgh Zoning Board</u>		
Name	Title	Year
Grace Cardone	Chairwoman	2003-2013
	Board Member	2014-2015
Paul Blanchard	Board Member	2003-2005
Ruth Eaton	Board Member	2003-2011
Michael Maher	Board Member	2003-2006; 2008-2016

Frank Galli	Board Member	2003; (January-May) 2004
John McKelvey	Board Member	2003-2021
Robert Kunkel	Board Member	(July-December) 2003-2007
Richard Harris	Board Member	(January-June) 2003
Mary Salantrie	Secretary	2003-2004
Carolyn L. Martini, Esq.	Board Member	2003-2004
Ronald Hughes	Board Member	(June-December) 2004-2012
James Manley	Board Member	(May-December) 2006-2017
Brenda Drake	Board Member	2007-2013
John Masten	Board Member	2013-present
Roseanne Smith	Board Member	2013-2014
Darrin Scalzo	Board Member	(May-December) 2014-2017
	Chairman	2018-present
Richard Levin	Board Member	2015-2021
Darrell Bell	Board Member	(December) 2016-present
Peter Olympia	Board Member	2017-2020
Anthony Marino	Board Member	2018-2021
Gregory M. Hermance	Board Member	(November-December)2020-present
Robert Gramstad	Board Member	2021-2023
James Eberhart, Jr.	Board Member	2021-present
Donna Rein	Board Member	(December) 2022-present
David Donovan, Esq.		2022-present
Joseph Mattina	Building Inspector	2022-2023

Siobhan Jablesnik	Secretary	2022-present
James Politi	Board Member	(December) 2023-present
<u>Elected Officials</u>		
Name	Title	Year
Robert J. Petrillo	Councilman/woman	2003
George A. Woolsey	Councilman/woman	2003-(June) 2015
Derek N. Benedict	Councilman/woman	2003-2009
James E. Manley	Councilman/woman	2003
Wayne C. Booth	Supervisor	2003-2014
Andrew J. Zarutskie	Town Clerk	2003-(April) 2019
Gilbert J. Piaquadio	Councilman/woman	2004-2014
	Supervisor	2015-present
Elizabeth J. Greene	Councilman/woman	2006-(April) 2024
George A. Woolsey	Councilman/woman	2010-(June) 2015
Ernest C. Bello Jr.	Councilman/woman	2010-2013
Paul I. Ruggiero	Councilman/woman	2014-present
James E. Pressuti	Councilman/woman	(March) 2015- (April) 2020
Scott M. Manley	Councilman/woman	(August) 2015-present
Anthony R. LoBiondo	Councilman/woman	(July) 2020-present
Joseph P. Pedi	Town Clerk	(May) 2019-2021
Lisa M. Vance Ayers	Town Clerk	2022-present
Elizabeth J. Greene	Receiver of Taxes	2002-2005
Mary Lou Venuto	Receiver of Taxes	2006-2013

Deborah A. Smith	Receiver of Taxes	2014-2021
Joseph P. Pedi	Receiver of Taxes	2022-present
Jude T. Martini	Town Justice	2003-present
Richard Clarino	Town Justice	2004-present

Dated: New York, New York
August 7, 2024

TROUTMAN PEPPER HAMILTON
SANDERS LLP

/s/ Bennet J. Moskowitz

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

VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF ORANGE)

Gilbert J. Piaquadio affirms pursuant to New York Civil Practice Law and Rules 2106, that the following is true and correct under penalty of perjury:

1. I am over 18 years of age and am the Supervisor of the Defendant Town of Newburgh and chairman of the Defendant Town Board of the Town of Newburgh. I am authorized to make this verification on behalf of the Town of Newburgh and the Town Board of the Town of Newburgh.

2. I have read the foregoing Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories and know the contents thereof, and the same are true to the best of my knowledge, information and belief.

3. I affirm this 7th day of August, 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.



Name: Gilbert J. Piaquadio
Title: Town Supervisor and Chairman of the
Town Board