

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,

Plaintiffs,

Index No.: EF002460-2024

v.

**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' Reply Memorandum Of Law In Support Of Defendants' Motion For Summary Judgment and Defendants' Responses to Plaintiffs' Statement of Material Facts As To Which There Are No Genuine Issues To Be Tried, which materials are attached hereto as described below.

3. Attached hereto as **Exhibit K** is a copy of the transcript from the deposition of Dr. A. K. Sandoval-Strausz, held on September 9, 2024.

4. Attached hereto as **Exhibit L** is a copy of Defendants' Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories.

Dated: New York, New York  
October 17, 2024

Respectfully submitted,

**TROUTMAN PEPPER HAMILTON  
SANDERS LLP**



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**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 153 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