

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.

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

Defendants.

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the supporting Memorandum of Law, the affirmation of Bennet J. Moskowitz dated October 16, 2024, and accompanying exhibits, Defendants Town of Newburgh and Town Board of the Town of Newburgh will move this Court, at the Supreme Court of the State of New York, Orange County, 285 Main Street, Goshen, New York, Motion Part, on October 29, 2024 at 9:30 a.m., or as soon thereafter as counsel can be heard, for an order excluding the purported "Addendum" of expert Dr. Matt A. Barreto and any testimony and/or opinions regarding the same and for such other relief in favor of Defendants as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, per the Court's Pretrial Requirements effective January 1, 2024 [NYSCEF No. 46], opposition papers, if any, must be served upon the undersigned at least seven (7) days before trial; and reply papers, if any, must be served upon all parties at least five (5) days before trial.

Dated: New York, New York  
October 16, 2024

TROUTMAN PEPPER HAMILTON  
SANDERS LLP

*/s/ Bennet J. Moskowitz*

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