

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

AFFIRMATION OF RUTH GREENWOOD

RUTH GREENWOOD, an attorney duly admitted to practice in the courts of the State of New York, affirms the following statements to be true under the penalties of perjury:

1. I am the Director of the Election Law Clinic at Harvard Law School and, along with attorneys from the law firm Abrams Fensterman, LLP, counsel for Plaintiffs Oral Clarke, Romance Reed, Grace Perez, Peter Ramon, Ernest Tirado, and Dorothy Flournoy.

2. I submit this affirmation to present to the Court with materials cited in Plaintiffs’ Memorandum of Law in Opposition to Defendants’ Motion in Limine, which are attached hereto as described below.

3. Exhibit A is a true and correct copy of an email sent by David Imamura, counsel for Plaintiffs, to counsel for Defendants on September 11, 2024.

4. Exhibit B is a true and correct copy of an email exchange between Mr. Imamura and counsel for Defendants during September 2024.

5. Exhibit C is a true and correct copy of an email exchange between Mr. Imamura and counsel for Defendants during July 2024.

I affirm this 24th day of October, 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.

Dated: Cambridge, MA
October 24, 2024



Ruth Greenwood