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 for Summary Judgment, which are attached hereto as described below.

3. Exhibit A is a true and correct copy of Plaintiff Oral Clarke's Responses to Depositions on Written Questions, signed under penalty of perjury on September 23, 2024.

4. Exhibit B is a true and correct copy of Plaintiff Peter Ramon's Responses to Depositions on Written Questions, signed under penalty of perjury on September 23, 2024.

5. Exhibit C is a true and correct copy of Plaintiff Romance Reed's Responses to Depositions on Written Questions, signed under penalty of perjury on September 23, 2024.

6. Exhibit D is a true and correct copy of the transcript of the deposition of Plaintiff Dorothy Flournoy, held on July 26, 2024.

7. Exhibit E is a true and correct copy of the transcript of the deposition of Plaintiff Grace Perez, held on August 5, 2024.

8. Exhibit F is a true and correct copy of the transcript of the deposition of Plaintiff Ernest Tirado, held on August 6, 2024.

9. Exhibit G is a true and correct copy of the bill jacket for New York Senate Bill 2021-S1046E, the John R. Lewis Voting Rights Act of New York.

10. Exhibit H is a true and correct copy of a letter sent by plaintiffs via certified mail to the Newburgh Town Clerk on January 26, 2024.

11. Exhibit I is a true and correct copy of the minutes of a special meeting of the Town Board of the Town of Newburgh held on March 15, 2024.

12. Exhibit J is a true and correct copy of the expert report of Professor Andrew Sandoval-Strausz.

13. Exhibit K is a true and correct copy of the transcript of the deposition of Town Supervisor Gil Piaquadio, held on August 8, 2024.

14. Exhibit L is a true and correct copy of Defendants' Responses and Objections to Plaintiffs' First Set of Interrogatories, verified by Town Supervisor Gil Piaquadio on July 1, 2024.

15. Exhibit M is a true and correct copy of the expert report of Dr. Matt Barreto.

16. Exhibit N is a true and correct copy of the transcript of the deposition of Dr. Matt Barreto, held on September 13, 2024.

17. Exhibit O is a true and correct copy of the expert report of Professor Brad Lockerbie.

18. Exhibit P is a true and correct copy of the transcript of the deposition of Professor Brad Lockerbie, held on September 11, 2024.

19. Exhibit Q is a true and correct copy of the transcript of the deposition of Professor Donald Critchlow, held on September 12, 2024.

20. Exhibit R is a true and correct copy of the addendum to Dr. Matt Barreto's expert report, disclosed to Defendants on September 4, 2024.

21. Exhibit S is a true and correct copy of a news article appearing in the New York Times on October 5, 1992, available at https://www.nytimes.com/1992/10/05/nyregion/hands-join-in-newburgh-to-protest-klan-picnic.html.

22. Exhibit T is a true and correct copy of a verified complaint filed in the United States District Court, Southern District of New York on October 23, 2012, in the matter captioned Hassan Gray v. Douglas Elliott, Wayne Booth, Supervisor Town of Newburgh, Town of Newburgh, Case No. Case 7:12-cv-07880-CS.

23. Exhibit U is a true and correct copy of an order entered by the United States District Court, Southern District of New York on May 23, 2014, in the matter captioned Hassan Gray v. Douglas Elliott, Wayne Booth, Supervisor Town of Newburgh, Town of Newburgh, Case No. Case 7:12-cv-07880-CS.

24. Exhibit V is a true and correct copy of a news article appearing in the Hudson Valley Press on December 7, 2016, available at https://hudsonvalleypress.com/2016/12/07/racism-within-highway-department-must-end/.

25. Exhibit W is a true and correct copy of 22 CRR-NY 217.1.

26. Exhibit X is a true and correct copy of a press release issued by the Town of Newburgh on May 9, 2023, available at

https://web.archive.org/web/20230605125612/https:/www.townofnewburgh.org/cn/news/index.cfm?NID=55733&jump2=0.

27. Exhibit Y is a true and correct copy of a sworn affidavit of Supervisor Gil Piaquadio, executed on May 12, 2023, and submitted in the Supreme Court of the State of New York, County of Orange, in the matter captioned Town of Newburgh, New York v. Newburgh EOM LLC, d/b/a Crossroads Hotel, and Crossroads Hotel, No. EF003105-2023.

28. Exhibit Z is a true and correct copy of a press release issued by the Town of Newburgh on May 12, 2023, available at https://web.archive.org/web/20230531044151/https:/www.townofnewburgh.org/cn/news/index.cfm?NID=55751&jump2=0.

29. Exhibit AA is a true and correct copy of a verified complaint filed on May 12, 2023, in the Supreme Court of the State of New York, County of Orange, in the matter captioned Town of Newburgh, New York v. Newburgh EOM LLC, d/b/a Crossroads Hotel, and Crossroads Hotel, No. EF003105-2023.

30. Exhibit BB is a true and correct copy of a Memorandum of Law filed by the Attorney General of the State of New York on September 27, 2024, in the Supreme Court of the State of New York, County of Erie, in the matter captioned Kenneth Young v. Town of Cheektowaga, No. 803989/2024.

31. Exhibit CC is a true and correct copy of the First Amended Complaint filed on May 13, 2024, in the Supreme Court of the State of New York, County of Jefferson, in the matter captioned Ashlaw et al. v. New York et al., No. EF2024-00001746.

32. Exhibit DD is a true and correct copy of an order entered on October 8, 2024, by the Hon. Gerald J. Neri of the Supreme Court of the State of New York, County of Onondaga, in the matter captioned County of Onondaga et al. v. New York et al., No. 003095/2024.

I affirm this 10th 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 10, 2024

Ruth Greenwood