

Exhibit B

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

**PLAINTIFF PETER RAMÓN'S
RESPONSES TO DEPOSITION
ON WRITTEN QUESTIONS**

Plaintiff Peter Ramón (“Plaintiff”) submits these Responses to the Deposition on Written Questions of Defendants Town of Newburgh (the “Town”) and the Town Board of the Town of Newburgh (the “Town Board,” and, collectively with the Town, “Defendants”), served upon counsel for the Plaintiffs on September 11, 2024.

RESERVATION OF RIGHTS

1. The Responses made herein are based on Plaintiff’s knowledge as of the date of this response. Plaintiff reserves the right to amend or supplement these Responses with additional information that may become available or come to his attention, and to rely upon such information in any hearing, trial, or other proceeding in this litigation in accordance with the applicable New York Civil Practice Law and Rules (“CPLR”), the Local Civil Rules and Orders of this Court. By this reservation, Plaintiff does not, however, assume a continuing responsibility to update these Responses beyond the requirements of the applicable CPLR, the Local Civil Rules and Orders of this Court.

2. These Responses are made without in any way waiving or intending to waive: (i) any objections as to the competency, authenticity, relevancy, materiality, privilege, or admissibility as evidence, for any purpose, of information produced in response to these questions; (ii) the right

to object on any ground to the use of the information provided in response to the questions for any purposes, including at any hearings or at trial; (iii) the right to object on any ground at any time to a request for further responses to the questions; or (iv) the right at any time to revise, correct, add to, supplement, or clarify any of the objections contained herein, all of which objections and rights are expressly reserved.

3. These Responses are supplied for use in this lawsuit and for no other purpose and are supplied subject to that limitation. Any information provided by Plaintiff in response to these questions is provided without conceding the information's relevance, admissibility, authenticity, or probative value. Plaintiff reserves the right to object to the use, competency, relevancy, materiality, or admissibility of any of these Responses at trial or any other proceedings, as Plaintiff deems necessary and appropriate. Unless otherwise stated, Plaintiff responds to the following questions according to his interpretation and definition of the terms and phrases used in the questions.

4. A response to a question stating objections shall not be deemed or construed to mean that Plaintiff has responsive information; knew about or performed any of the acts described in the question or definitions or instructions applicable to the questions; or agrees with the characterization of the conduct or activities described in the question or definitions or instructions applicable to the question. Provision of the information contained herein is not intended to imply that such information is in the possession, custody, or control of Plaintiff.

RESPONSES TO DEPOSITION QUESTIONS

1. How long have you lived in the Town of Newburgh?

Response: 33 years.

2. How did you identify your race on the 2020 census?

Response: Hispanic.

3. How many local elections have you voted in?

Response: I do not recall exactly, but around three or four. I always vote in presidential elections.

4. With which political groups are you associated?

Response: The Democratic Party.

5. For which candidates have you volunteered or assisted with local elections in the Town of Newburgh?

Response: I volunteered to assist Diana Campos, who was a candidate for Town Clerk.

6. Did you ever speak or testify at a Town Hall meeting?

Response: I do not recall ever speaking or testifying at a Town Hall meeting.

a. What was the content of your testimony?

Response: Not applicable.

b. How did the Town Board respond to your testimony?

Response: Not applicable.

7. Have you ever voiced concerns or expressed opinions to any members of Town government?

Response: I have not personally voiced concerns or expressed opinions to members of the Town government

a. What were those concerns?

Response: Not applicable.

b. What was the response to those concerns?

Response: Not applicable.

8. Do you know of any individuals in the Town's Black community who have voiced concerns to the Town Board?

Response: I do not personally know any individuals, but I have heard that people have raised concerns to Town government.

a. What were their concerns?

Response: Real property issues

b. What was the Town Board's response?

Response: I do not recall.

9. Do you know of any individuals in the Town's Hispanic community who have voiced concerns to the Town Board?

Response: I do recall any members of the Hispanic community who have voiced concerns to the Town Board.

a. What were their concerns?

Response: Not applicable.

b. What was the Town Board's response?

Response: Not applicable.

10. Paragraph 122 of the Complaint states: "The Town Board has shown little regard for the particularized concerns of the Black or Hispanic communities." What facts are you aware of that support, contradict or otherwise concern those allegations?

Response: In my time living in Newburgh, I do not recall ever seeing the Town government acknowledge or celebrate Hispanic or Black heritage.

11. Paragraph 82 of the Complaint states: "There is a long history of discrimination against the Black and Hispanic communities in the Town." What facts are you aware of that support, contradict or otherwise concern those allegations?

Response: In my time living in Newburgh, I do not recall ever seeing the Town government acknowledge or celebrate Hispanic or Black heritage.

12. Paragraph 72 of the Complaint states: “Black and Hispanic voters in the Town of Newburgh are also politically cohesive with each other.” What facts are you aware of that support, contradict or otherwise concern those allegations?

Response: Plaintiff objects to this question to the extent that it requires expertise which he does not possess.

Subject to and without waiving that objection, Plaintiff responds: I often discuss the things going on in the Town with other Hispanic and Black voters.

I affirm this 23rd day of September, 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.

/s/ Peter Ramón
PETER RAMÓN