

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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DEBORAH ALEXANDER, MAUD MARON, and : Case No. 1:24-cv-2224-DG-JRC
NOAH HARLAN, :
:
Plaintiffs, :
:
v. :
:
TAJH SUTTON, President, Community Education :
Council 14, in her official and individual capacities; :
MARISSA MANZANARES, First Vice President, :
Community Education Council 14, in her official :
and individual capacities; DAVID C. BANKS, :
Chancellor, New York City Public Schools, in his :
official and individual capacities; NINA S. :
MICKENS, Equity Compliance Officer, in her :
official and individual capacities; COMMUNITY :
EDUCATION COUNCIL 14; NEW YORK CITY :
DEPARTMENT OF EDUCATION, :
Defendants. :
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DECLARATION OF ALAN GURA

I, Alan Gura, declare and state as follows:

1. I make this declaration in support of the Application for a Temporary Restraining Order and Preliminary Injunction, filed by the Plaintiffs in this action, Deborah Alexander, Maud Maron, and Noah Harlan, for use in any other proceeding in the above-styled action, and for any other use or purpose authorized by law.
2. I am counsel for Plaintiffs in the above-captioned case.
3. Yesterday, April 15, 2024, at 1:30 pm, I filed Plaintiffs’ Motion for Order to Show Cause re: Temporary Restraining Order and Preliminary Injunction.

4. In seeking emergency relief with respect to the conduct of CEC 14 public meetings, the motion noted that “CEC 14 is required to hold a public meeting at least once a month. N.Y.S. Education Law § 2590-e(14). The April 2024 meeting has not yet taken place, but as of this writing, it is legally required to occur within the next 15 days.” Dkt. 13, at 6, ¶ 26.

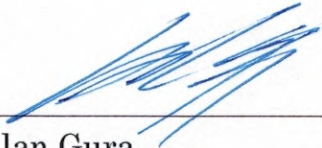
5. It appears that shortly after the motion was filed (on information and belief, approximately one hour later), Defendants set the April, 2024 meeting for April 18, 2024, from 6pm-8pm.

6. A pop-up window on CEC 14’s website now contains an announcement of this meeting, with a link to a registration form for the meeting. The registration form again requires people to, among other things, “commit to uphold the D14 Community Commitments.”

7. If relief is not granted before this time, Plaintiffs will not be able to register for, attend, or speak freely at this public school board meeting.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 16, 2024.



Alan Gura