

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re: New York City Policing During Summer

Index No. 20-CV-8924 (CM)(GWG)

2020 Demonstrations

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**DECLARATION OF LILLIAN MARQUEZ IN SUPPORT
OF PLAINTIFFS' MOTION TO PRECLUDE**

LILLIAN MARQUEZ, a member of the Bar of New York and a member of the bar of this Court, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am an attorney at the Office of the New York State Attorney General and serve as counsel for the People of the State of New York, a plaintiff in this consolidated action. As such, I am fully familiar with the facts and circumstances of this proceeding.

2. I submit this declaration in support of the plaintiffs' motion to preclude. Attached to this declaration are documents referenced in plaintiffs' memorandum of law in support of the motion to preclude.

3. Attached as Exhibit A to this declaration is a placeholder for the transcript of the public press conference held by Commissioner Dermot Shea.

4. Attached as Exhibit B to this declaration is a true and correct copy of the transcript of Mayor Bill De Blasio on the Brian Lehrer Show.

5. Attached as Exhibit C to this declaration is a true and correct copy of the transcript of the 9/2/2020 Department of Investigation (DOI) Interview Transcript of Chief Harry J. Wedin.

6. Attached as Exhibit D to this declaration is a true and correct copy of the Statement of former Police Commissioner Dermot Shea.

7. Attached as Exhibit E to this declaration is a true and correct copy of the transcript of the October 28 Department of Investigation Interview Transcript with Chief Terence Monahan.

8. Attached as Exhibit F to this declaration is a true and correct copy of the transcript of the November 17 Department of Investigation Interview Transcript with Chief Lehr.

9. Attached as Exhibit G to this declaration is a true and correct copy of the DOI Investigation into NYPD Response to the George Floyd Protests.

10. Attached as Exhibit H to this declaration is a true and correct copy of the transcript of the Proceedings before the Honorable Gabriel W. Gorenstein.

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

Dated: April 11, 2023
New York, N.Y.

/s/ Lillian Marquez

Lillian Marquez, *Assistant Attorney General*
Office of the New York State Attorney General
28 Liberty Street, 20th Floor
New York, NY 10005
(212) 416-8250
Lillian.Marquez@ag.ny.gov

*Counsel for Plaintiffs in People of the State of
New York v. City of New York, No. 21-cv-322*