

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX, CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; HILLARY MOREAU;
AND WASHINGTON SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT AND MARYELLEN ELIA, IN
HER CAPACITY AS THE
COMMISSIONER OF EDUCATION OF
THE STATE OF NEW YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

DECLARATION OF DR. STEVEN P. COLE

Dr. Steven P. Cole, pursuant to the provisions of 28 U.S.C. § 1746, declares as follows:

1. I respectfully submit this declaration in support of Plaintiffs' motion for a preliminary injunction.

2. I have been retained by Latham & Watkins LLP and the New York Civil Liberties Union Foundation, counsel for Plaintiffs in the above-captioned litigation, to prepare an expert opinion regarding the existence and extent of racially-polarized voting in the East Ramapo Central School District, located in Rockland County, New York.

3. Annexed to this Declaration as Exhibit 1 is a copy of my preliminary expert report. My findings and conclusions are contained in the attached report.

I, the undersigned, being a resident qualified to be sworn in as a Justice of the Peace in the State of California, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files and records of the County of Santa Clara, California.

Witness my hand and seal of office this 8th day of December, 2017.

Notary Public for the State of California
My Commission Expires 12/31/2019

Steven P. Cole

Notary Public for the State of California