

**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 AMY STUART WELLS

AMY STUART WELLS, pursuant to the provisions of 28 U.S.C. § 1746, declares as follows:

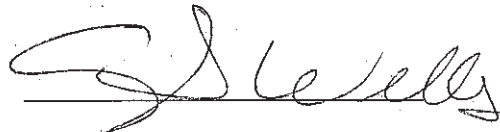
1. I respectfully submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
2. I have been retained by Latham & Watkins LLP and the New York Civil Liberties Union Foundation, counsel for Plaintiffs in the above-captioned litigation, to prepare an expert opinion regarding whether and to what extent (a) racial and ethnic minorities living within the East Ramapo Central School District located in Rockland County, New York bear the effects of discrimination in education and (b) the Board of Education of the East Ramapo Central School District is responsive to the needs of the racial and ethnic minorities living within the district.

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.

4. Annexed to this Declaration as Exhibit 2 is a copy of my CV. I am compensated at the rate of \$200 per hour for my work.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 7, 2017
New York, New York

A handwritten signature in black ink, appearing to read "Amy Stuart Wells", written over a horizontal line.

AMY STUART WELLS