

NAACP 30b6

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2 ** R O U G H D R A F T **
3 UNITED STATES DISTRICT COURT
4 SOUTHERN DISTRICT OF NEW YORK
5 Civil Action No. 7:17-cv-08943
6 -----X
7 NATIONAL ASSOCIATION FOR THE ADVANCEMENT
8 OF COLORED PEOPLE, SPRING VALLEY BRANCH,
9 et al.,
10 Plaintiffs,
11 - against -
12 EAST RAMAPO CENTRAL SCHOOL DISTRICT,
13 et al.,
14 Defendants.
15 -----X
16 March 8, 2018
17 2:05 p.m.
18
19 Deposition of NATIONAL ASSOCIATION
20 FOR THE ADVANCEMENT OF COLORED PEOPLE,
21 SPRING VALLEY BRANCH, by WILLIE J. TROTMAN,
22 taken by Defendants, pursuant to Rule
23 30(b)(6) Notice, held at the offices of
24 Morgan Lewis & Bockius LLP, 101 Park
25 Avenue, New York, New York, before Todd
DeSimone, a Registered Professional
Reporter and Notary Public of the State of
New York.

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2 A P P E A R A N C E S :

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2 A P P E A R A N C E S: (Continued)
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1 TROTMAN
2 W I L L I E J. T R O T M A N ,
3 called as a witness, having been first duly
4 sworn, was examined and testified
5 as follows:
6 ^ EXAMINATION BY MR. BUTLER:
7 Q. Good afternoon, Mr. Trotman.
8 How are you today?
9 A. Good afternoon.
10 Q. Are you doing okay?
11 A. I'm doing okay.

12 A. The NAACP represents our youth
13 council, the students of East Ramapo
14 Central School District --
15 Q. They don't vote.
16 A. Some of them do.
17 Q. Some of them do?
18 A. That's right.
19 Q. Those who are over 18?
20 A. 18 and over.
21 Q. What percentage of your youth
22 council are voters?
23 A. We don't check.
24 Q. You don't know?
25 A. We don't deal with that data.

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1 TROTMAN
2 MR. TURNER: I will need to
3 note the witness didn't get to finish his
4 answer as to the interest in the
5 litigation.
6 Q. Anything more you want to say
7 about the NAACP's interest in the
8 litigation other than the youth council?
9 A. We believe 100 percent in a
10 democratic society and that everyone needs
11 to and should be represented. We don't
12 think that there is adequate representation
13 and we are seeking measures to ensure that
14 that happens. The way it stands now, we
15 don't feel that the students of East
16 Ramapo, the students of East Ramapo, are

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17 receiving adequate education.

18 Q. So the NAACP is involved in a
19 Voting Rights Act case in order to ensure
20 that students in the public school get an
21 adequate education?

22 A. All students.

23 Q. All students get an adequate
24 education?

25 A. Correct.

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1 TROTMAN

2 Q. That has nothing to do with the
3 voting for anything, it only has to do with
4 a result of assuring adequate education?

5 MR. TURNER: Objection to form.

6 A. It has everything to do with
7 the voting. If there were seven members of
8 the East Ramapo Central School District who
9 said, who showed, who exemplified that we
10 believe in education for each and every
11 student, I wouldn't care what color they
12 are, what religion they are, it would not
13 matter.

14 Q. But you are convinced that some
15 of the members of the East Ramapo Central
16 School District do not believe in the
17 importance of providing education to all
18 students; is that your testimony?

19 A. That's my testimony.

20 Q. And that's based upon the fact

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8 that there was simply a promotion.

9 MR. BUTLER: I have nothing
10 further. Thank you.

11 MR. TURNER: We need to just
12 caucus for one minute and figure out
13 whether there is any redirect.

14 (Recess taken.)

15 EXAMINATION BY MR. Turner:

16 Q. Mr. Trotman, do you remember
17 during your deposition when you were
18 talking about the possibility of black and
19 Latino children attending Yeshivas?

20 A. Right.

21 Q. Do you remember that?

22 A. Yes.

23 Q. During that discussion were you
24 testifying about official positions of the
25 NAACP or were you testifying about your own

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1 TROTMAN

2 personal views and thoughts?

3 A. It came out as my personal view
4 and I need to correct that.

5 MR. TURNER: That's all I have.

6 MR. BUTLER: I will stand on
7 the record. Thank you. 4:44

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