

EXHIBIT A

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 Case No. 7:17-cv-08943

4 - - - - -x

5 NATIONAL ASSOCIATION FOR THE
6 ADVANCEMENT OF COLORED PEOPLE, SPRING
7 VALLEY BRANCH; JULIO CLERVEAUX; CHEVON
8 DOS REIS; ERIC GOODWIN; JOSE VITELIO
9 GREGORIO; DOROTHY MILLER; HILLARY
10 MOREAU; and WASHINGTON SANCHEZ,

11 Plaintiffs,

12 -against-

13 EAST RAMAPO CENTRAL SCHOOL DISTRICT and
14 MARYELLEN ELIA, IN HER CAPACITY AS THE
15 COMMISSIONER OF EDUCATION OF THE STATE
16 OF NEW YORK,

17 Defendants.

18 - - - - -x

19 November 8, 2018
20 9:14 a.m.

21 Deposition of EUSTACHE CLERVEAUX, taken
22 by attorneys for Defendant East Ramapo Central
23 School District. pursuant to subpoena, held at
24 the offices of Morgan Lewis & Bockius LLP, 101
25 Park Avenue, New York, New York, before Helen
Mitchell, a Registered Professional Reporter and
Notary Public.

1 E U S T A C H E C L E R V E A U X,
2 having been first duly sworn by the Notary
3 Public (Helen Mitchell), was examined and
4 testified as follows:

5 EXAMINATION

6 BY MS. KOLLM:

7 Q Good morning.

8 A Good morning.

9 Q My name is Clara Kollm, and I'm
10 here representing the East Ramapo Central School
11 District.

12 Can you please state your full
13 name for the record?

14 A Eustache Clerveaux.

15 Q Do you understand that you're
16 here today pursuant to a subpoena?

17 A Yes.

18 Q Do you understand that the case
19 caption in this case is the NAACP of Spring
20 Valley versus East Ramapo Central School
21 District?

22 A Yes.

23 Q On what date did you first
24 learn that you were asked to sit for a
25 deposition?

1 school community," what does that mean to you in
2 the context of this litigation?

3 A It's mean people who live in
4 the community and -- and they -- whether they or
5 their children or their friends go to private
6 schools.

7 Q Do you consider yourself part
8 of the private school community?

9 A Yes.

10 Q So you're part of both the
11 public school community and the private school
12 community?

13 A Yes, I believe so.

14 Q Would the private school
15 community include religious schools in the
16 district?

17 A Any private schools, whether
18 religious or not.

19 Q To the best of your knowledge,
20 do minorities send their kids to private schools
21 in the district?

22 A I think people have the choice
23 to decide that on their own, whether they want
24 to send it to public or private.

25 Q So to the best of your

1 knowledge, do students of color attend private
2 schools within the district?

3 MS. CALABRESE: Objection to
4 the form of the question.

5 A Again, people send their kids
6 to the school of their choice, whether it's
7 public or private.

8 Q You just don't know one way or
9 the other?

10 A What do you mean I don't know
11 one way or the other?

12 Q Do you know -- do you have
13 personal knowledge about whether persons of
14 color attend private schools in the district?

15 A Oh.

16 They send their school to
17 public and private.

18 Q Do you know a person by the
19 name of Emilia White?

20 A Yes, I do.

21 Q Under what circumstances do you
22 know Emilia White?

23 A A member of the community.

24 Q Did Emilia White help with your
25 campaign for school board?

C E R T I F I C A T E

I, HELEN MITCHELL, a Registered
Professional Reporter and Notary Public, do
hereby certify:

I reported the proceedings in the
within-entitled matter, and that the within
transcript is a true record of such proceedings.

I further certify that I am not related, by
blood or marriage, to any of the parties in this
matter and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 14th day of November, 2018.



HELEN MITCHELL, RPR