

EXHIBIT B

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 19, 2018
20 11:00 a.m.

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

VERITEXT LEGAL SOLUTIONS
MID-ATLANTIC REGION
1250 Eye Street NW - Suite 350
Washington, D.C. 20005

Moreau

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1 H I L L A R Y M O R E A U,
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. My name is Clara
8 Kollm and I represent the East Ramapo Central
9 School District in this litigation.

10 Will you please state your full
11 name for the record.

12 A Hillary Moreau.

13 Q Is your current address 48
14 Creekside Circle, Spring Valley, New York,
15 10977?

16 A Yes.

17 Q Are you represented by counsel
18 today?

19 A Yes.

20 Q Is that your lawyer sitting
21 next to you?

22 A Yes.

23 Q Have you given testimony in a
24 deposition previously?

25 A No.

Moreau

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1 Q And your kids and Mr. Germain's
2 kids attend school within the district; is that
3 right?

4 A Our kids were of the same age
5 to go to school, so they were familiar with each
6 other.

7 Q Do your kids attend public
8 school in the district?

9 A No.

10 Q Have your kids ever attended
11 public school in the district?

12 A No.

13 Q How old are your children?

14 A Twenty-five.

15 Q Do you have more than one
16 child?

17 A No.

18 Q One child who's 25?

19 A (Nodding)

20 Q Who never attended school in
21 the East Ramapo Central School District?

22 A Right.

23 Q Did your child attend private
24 school at any point?

25 A She did.

Moreau

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1 Q Was the private school within
2 the East Ramapo Central School District?

3 A One of them.

4 Q What was the name of that
5 school?

6 A Saint Joe's Catholic school.

7 Q For the record, could you state
8 your race, please?

9 A My race?

10 Q Yes.

11 A I'm African American.

12 Q Is your daughter also African
13 American?

14 A Yes.

15 Q Are there other African
16 American students at St. Joe's Catholic school?

17 MR. PEARCE: Object to the
18 form.

19 Q When your daughter attended
20 school at St. Joe's Catholic school, did she
21 attend with other minority classmates?

22 A So, yes. There was a mix of
23 races at St. Joe's school.

24 Q Do you remember when your
25 daughter attended St. Joe's Catholic school?

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 26th day of November, 2018.



HELEN MITCHELL, RPR