

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LAWRENCE GILDER,

Plaintiff,

-against-

DECLARATION

JOHN P. GULLINO, both individually and in his capacity as the Chairman of the DEMOCRATIC COMMITTEE OF RICHMOND COUNTY, BOARD OF ELECTIONS IN THE CITY OF NEW YORK, CLERK 1, CLERK 2 and CLERK 3, said names being as of yet unidentified parties, JOHN and JANE DOES 1-10, said names being fictitious; XYZ ENTITIES, AND JOHN DOE(S) #1-10,

Index No.: 15-CV-04094
(KAM)(RER)

Defendants.

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ANDREW L. HOFFMAN, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I am an attorney admitted to practice law in the State of New York and am Of Counsel to Langweber McQuat, LLP. As such, I am fully familiar with the facts and circumstances below.
2. I submit this Declaration in support of Defendants John Gulino and the Democratic Party of Richmond County's Motion to Dismiss, seeking dismissal of Plaintiffs' Complaint in its entirety, pursuant to FED. R. CIV. P. § 12(b)(6).
3. The By-Laws for the Democratic Committee are annexed as **Exhibit A**.
4. Plaintiff's Complaint with Exhibits is annexed as **Exhibit B**.

Dated: October 15, 2015
New York, NY

Respectfully Submitted,

By:

/s/ Andrew L. Hoffman
Langweber McQuat, LLP

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*Counsel to Defendants John P. Gulino, Esq.,
and the Democratic Committee of Richmond
County*