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May 9, 2022

By ECF

The Honorable Gary L. Sharpe
United States District Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 411
Albany, NY 12207

Re: *United States of America v. New York State Board of Elections, et al.*
10-cv-1214 (GLS)

Dear Judge Sharpe:

We represent proposed intervenors and New York voters, Belinda de Gaudemar and Susan Schoenfeld (“UOCAVA Plaintiffs”), together with the Elias Law Group LLP. We write to enclose another declaration in further opposition to the State Board of Elections (SBOE)’s May 5, 2022 Letter Motion Requesting a Supplemental Order (ECF No. 92).

Dated: May 9, 2022

Respectfully Submitted,

ELIAS LAW GROUP LLP

EMERY CELLI BRINCKERHOFF
ABADY WARD & MAAZEL LLP

By: /s/ Aria C. Branch

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Enclosure

**Pro hac vice applications to be submitted.*

DECLARATION OF STEVEN STASHWICK

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.
2. I am a citizen of the United States and am registered to vote in the State of New York.
3. I intend to vote for congressional candidates in the upcoming 2022 primary and general elections.
4. At this time, I am currently stationed in Iraq, serving as a mobilized Navy Reservist at U.S. Embassy – Baghdad. Because of this assignment, I will be an overseas absentee voter for the 2022 elections.
5. My legal residence in the United States is at 204 West 140th St., Apt. 3E, New York, NY 10030, which is located in congressional district 13, and where I have typically voted locally, in-person. I am a reserve naval officer, presently serving at the rank of Commander (O-5). In that capacity, in April 2022, I was involuntarily mobilized (i.e., recalled to active duty) to serve at a posting in the defense cooperation office at U.S. Embassy – Baghdad in Iraq. This assignment will keep me in Iraq and away from my legal residence through at least January 2023, requiring me to participate in the 2022 elections as an absentee voter.
6. Given New York's prior election administration practices, I am concerned that if the federal primary election is moved to August, I will not receive my general election ballot in time to vote my ballot, mail it back to the appropriate election authority, and have it counted in the 2022 congressional general election. Being assigned at an overseas embassy, my mail is served by military/diplomatic post, which introduces additional delivery delays (due to extra screening and other logistical requirements) beyond normal mail.
7. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 8th day of May, 2022.

Steve Stashwick

Steven Stashwick