

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC  
PARTICIPATION, MARY WINTER, GENE  
STEINBERG, NANCY HART, SARAH  
WOLFF, KAREN SLAVEN, KATE KENNEDY,  
EDA DANIEL, and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its  
attorney general, LETITIA JAMES, ATTORNEY  
GENERAL OF THE STATE OF NEW YORK,

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.  
BURKMAN & ASSOCIATES, LLC, PROJECT  
1599, and JOHN and JANE DOES 1–10,

Defendants.

Civil Action No. 20-cv-8668

**REPLY DECLARATION OF FRANKLIN MONSOUR JR. IN FURTHER SUPPORT OF  
PLAINTIFFS' JOINT MOTION FOR SUMMARY JUDGMENT AS TO LIABILITY ON  
ALL CLAIMS**

I, Franklin Monsour Jr. declare as follows:

1. I am an active member of the New York Bar and am associated with the law firm Orrick, Herrington & Sutcliffe LLP, counsel for Plaintiffs National Coalition on Black Civic Participation, Mary Winter, Gene Steinberg, Nancy Hart, Sarah Wolff, Karen Slaven, Kate Kennedy, Eda Daniel, and Andrea Sferes. I make this declaration based on my personal knowledge.

2. Attached as Exhibit 77 is a true and correct copy of the relevant excerpts from Jacob Wohl's deposition taken on May 11, 2022 ("Wohl Dep.").

3. Attached as Exhibit 78 is a true and correct copy of Defendants' responses to Plaintiff-Intervenor People of the State of New York's Request for Admissions.

4. Pursuant to Judge Marrero's Individual Practices I.I.E., I attest that I am familiar with the full contents of the documents attached to this declaration, that I will maintain a copy of the entire documents in my case files until after a final court disposition of the action, and that the excerpts of documents filed with these motion papers are authentic copies of the relevant portions of the documents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on August 19, 2022

By: /s/ Franklin Monsour Jr.  
Franklin Monsour Jr.

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