

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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HAMID HASSAN RAZA; MASJID AL-ANSAR; ASAD  
DANDIA; MUSLIMS GIVING BACK; MASJID AT-  
TAQWA; MOHAMMAD ELSHINAWY,

**DECLARATION OF  
CHERYL L. SHAMMAS**

Plaintiffs,

-against-

13 CV 3448 (PKC)(JMA)

CITY OF NEW YORK; MICHAEL R. BLOOMBERG, in  
his official capacity as Mayor of the City of New York;  
RAYMOND KELLY, in his official capacity as Police  
Commissioner for the City of New York; DAVID COHEN  
in his official capacity as Deputy Commissioner of  
Intelligence for the City of New York,

Defendants.

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**CHERYL L. SHAMMAS**, an attorney duly admitted to practice in the United States  
District Court for the Southern District of New York, declares under penalty of perjury and  
pursuant to 28 U.S.C. §1746 that the following is true and correct:

1. I am a Senior Counsel in the office of ZACHARY W. CARTER, Corporation  
Counsel of the City of New York, attorney for Defendants.

2. I am familiar with the facts and circumstances stated herein based upon the books  
and records of the City of New York, and conversations with its agents and employees.

3. I submit this declaration in support of Defendants' Opposition to Plaintiffs'  
Objections to Defendants' Interrogatories Purportedly on Grounds of *First Amendment*  
Associational Privilege and So-Called "Retroactive Justification"

4. The following exhibits, cited in support of the motion, are attached hereto:

- Annexed hereto as **Exhibits A** is a true copy of Defendants' First Set of Interrogatories and Requests for Production;
- Annexed hereto as **Exhibits B** is a true copy of Plaintiffs' Responses and Objections to Defendants' First Set of Interrogatories, respectively.
- Annexed hereto as **Exhibits C** is a true copy of Plaintiffs' Responses and Objections to Defendants' First Set of Requests for Production

Dated: New York, New York  
August 1, 2014



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Cheryl L. Shamas  
*Senior Counsel*