

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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REV. STEVEN SOOS, REV. NICHOLAS STAMOS,
DANIEL SCHONBURN, ELCHANAN PERR, and
MAYER MAYERFELD,

Plaintiff,

**DECLARATION OF ELLEN
PARODI**

-against-

20-CV-00651

ANDREW M. CUOMO, Governor of the State of New
York, in his official capacity, LETITIA JAMES, Attorney
General of the State of New York in her official capacity,
and BILL DE BLASIO, Mayor of the City of New York, in
his official capacity,

Defendants.

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ELLEN PARODI, declares pursuant to 28 U.S.C. § 1746, under penalty of
perjury, that the following is true and correct:

1. I am an Assistant Corporation Counsel in the office of James E. Johnson,
Corporation Counsel of the City of New York, attorney for Defendant Bill De Blasio, Mayor of
the City of New York. My application for admission to this Court *pro hac vice* is currently
pending. I am familiar with the facts stated below and submit this declaration to place on the
record relevant documents in support of Defendant Bill De Blasio’s Memorandum of Law in
Opposition to Plaintiffs’ Motion for a Temporary Restraining Order.

2. Attached as Exhibit 1 are true and correct copies of New York State
Executive Order No. 202.3 entitled “Continuing Temporary Suspension and Modification of
Laws Relating to the Disaster Emergency,” signed by Governor Andrew M. Cuomo on March
16, 2020; also available at

https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/EO_202.3.pdf (last visited

June 12, 2020), New York State Executive Order No 202.5 entitled “Continuing Temporary Suspension and Modification of Laws Relating to the Disaster Emergency,” signed by Governor Andrew M. Cuomo on March 18, 2020; *also available at* https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/EO_202_5.pdf (last visited June 12, 2020), and New York State Executive Order No. 202.19 entitled “Continuing Temporary Suspension and Modification of Laws Relating to the Disaster Emergency,” signed by Governor Andrew M. Cuomo on April 17, 2020; *also available at* https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/EO_202.19.pdf (last visited June 12, 2020).

3. Attached as Exhibit 2 are true and correct copies of New York State Executive Order No. 202.33 entitled “Continuing Temporary Suspension and Modification of Laws Relating to the Disaster Emergency,” signed by Governor Andrew M. Cuomo on May 22, 2020; *also available at* <https://www.governor.ny.gov/news/no-20233-continuing-temporary-suspension-and-modification-laws-relating-disaster-emergency> (last visited June 13, 2020) and New York City Emergency Executive Order No. 115 entitled “Emergency Executive Order,” signed by Mayor Bill de Blasio on May 24, 2020; *also available at* <https://www1.nyc.gov/assets/home/downloads/pdf/executive-orders/2020/eeo-115.pdf> (last visited June 13, 2020).

4. Attached as Exhibit 3 is a true and correct copy of New York State Executive Order No. 202.38 entitled “Continuing Temporary Suspension and Modification of Laws Relating to the Disaster Emergency,” signed by Governor Andrew M. Cuomo on June 6, 2020; *also available at* <https://www.governor.ny.gov/sites/governor.ny.gov/files/atoms/files/EO-202.38-final.pdf> (last visited June 13, 2020).

5. Attached as Exhibit 4 are true and correct copies of the Order and Transcript of Oral Argument in the case *Butler v. City of New York*, 20-cv-4067 (S.D.N.Y. June 5, 2020).

6. Attached as Exhibit 5 is a true and correct copy of the Order denying plaintiff's application for an injunction pending appeal in *Geller v. de Blasio*, 20-1592 (2d Cir. June 4, 2020).

7. Attached as Exhibit 6 is a true and correct copy of New York City Emergency Executive Order No. 124 entitled "Emergency Executive Order," signed by Mayor Bill de Blasio on June 12, 2020.

Dated: New York, New York
June 15, 2020

_____/s/_____
Ellen Parodi
Assistant Corporation Counsel
(application for admission *pro hac*
vice pending)