

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FIVE BOROUGH BICYCLE CLUB,  
SHARON BLYTHE, JOSH GOSCIAK, )  
KENNETH T. JACKSON, MADELINE )  
NELSON, ELIZABETH SHURA, LUKE )  
SON, )

Plaintiffs, )

- against - )

THE CITY OF NEW YORK; RAYMOND )  
KELLY, Police Commissioner of the New )  
York City Police Department; JAMES )  
TULLER, Commanding Officer, Patrol )  
Borough Manhattan South; Lt. John Doe, )  
and Captain Jane Doe, New York City )  
Police Department, )

Defendants. )

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1. My name is Eileen Clancy.
2. I reside in New York City.
3. I am a professional videographer. In 2000 I helped found I-Witness Video, an organization located in New York City that uses video to protect civil liberties. I have worked on the I-Witness Video project since its founding.
4. I have extensive experience documenting and filming numerous group bicycle rides that have taken place in New York City.

5. Steve Vaccaro requested that I coordinate a project to document the traffic patterns at several intersections in New York City.

6. I offer this declaration to authenticate the video taken on March 18, 2007 at the corner of 39<sup>th</sup> Street and Second Avenue. The video is offered on a DVD identified as Overhead Shot 39<sup>th</sup> Street and Second Avenue and is attached as Exhibit A.

7. I was present at the filming on March 18, 2007 and I have reviewed the videotape. I attest that the recorded video accurately portrays the events that took place on that day.

I declare under penalty of perjury that the foregoing is true and correct.

*Eileen Clancy*  
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EILEEN CLANCY