

**WORDEN
DECLARATION**

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.)
----- x

07 Civ. _____

I, Katherine Worden, hereby declare as follows:

1. My name is Katherine Worden.
2. I am an associate with Debevoise & Plimpton, LLP.
3. I graduated from New York University School of Law in May of 2006. My application for admission to the Bar of New York is pending.
4. On Sunday, March 18, 2007, at approximately 12:00 pm, at the intersection of 39th Street and Second Avenue, I measured fifty feet north of the "northern leg" of the crosswalk on Second Avenue and placed a line of orange tape on the sidewalk to indicate the fifty foot mark. I did this on both the east and west side of Second Avenue. My

purpose was to ensure that aerial video footage to be taken from a building above this intersection of group bicycle ride known as "Ride to End All Wars" could be accurately scaled.

5. The width of the traffic lanes on Second Avenue vary. Facing south, the left-most lane and the right-most lane were occupied by parked cars on March 18, 2007, the day of the Ride to End All Wars. That leaves five traffic lanes. Facing south, the right-most traffic lane measured 9 feet 10 inches; the lane to the left of that measured 9 feet 10 inches; the lane to the left of that measured 10 feet 2 inches; the lane to the left of that measured 10 feet 2 inches; and the lane to the left of that measured 9 feet exactly.

6. The length of the Second Avenue between the interior crosswalk line on the north side of 39th Street to the interior crosswalk line on the south side of 40th Street measured 199.9 feet.

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

Executed this 25th day of March, 2007


KATHERINE WORDEN