

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

CARL HIGBIE, JOSEPH HARRIS, and)	
MICHAEL VOTRUBA,)	
)	
Plaintiffs,)	
)	Civil Action No. 1:24-cv-00174-MAD-TWD
v.)	
)	
STEVEN G. JAMES, in his Official)	
Capacity as Superintendent of the)	
New York State Police, SHERIFF KYLE)	
BOURGAULT, in his Official Capacity as)	
the Sheriff of Rensselaer County, New York,)	
SHERIFF DONALD J. KRAPF, in his)	
Official Capacity as the Sheriff of Columbia)	
County, New York, and JOHN DOES 1-10,)	
)	
Defendants.)	
_____)	

DECLARATION OF STEPHEN D. STAMBOULIEH

STEPHEN D. STAMBOULIEH, an attorney duly admitted to practice before this Court, declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am counsel for Carl Higbie, Joseph Harris, and Michael Votruba (hereinafter, “Plaintiffs”) in the above-captioned action.
2. I submit this declaration in support of Plaintiffs’ Motion for Summary Judgment, for the limited purpose of providing the Court with true and accurate copies of the following documents, including historical laws contained in the annexed Appendix, and referenced in the accompanying Memorandum of Law in Support of Plaintiff’s Motion for Summary Judgment, dated January 24, 2025 and Plaintiffs’ Statement of Undisputed Material Facts, submitted herewith in support of Plaintiffs’ motion:

Exhibit	Description of Exhibit
Exhibit 1	Deposition of Joseph Harris
Exhibit 2	Deposition of Michael Brennan
Exhibit 3	Deposition of Kyle Bourgault
Exhibit 4	Deposition of Donald Krapf
Exhibit 5	Deposition of Michael Votruba
Exhibit 6	Deposition of Carl Higbie
Exhibit 7	Superintendent James' Response to Plaintiffs' Request for Admission
Exhibit 8	Deposition of Michael Deyo
Exhibit 9	Appendix of Historical Laws

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

Executed on this, the 24th day of January, 2025.

Respectfully submitted,

/s/ Stephen D. Stamboulieh

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Certificate of Service

I, Stephen D. Stamboulieh, hereby certify that I have caused to be filed a true and correct copy of the foregoing document or pleading via the Court's CM/ECF system which sent a notice and copy of the foregoing to all counsel of record.

Dated: January 24, 2025

/s/ Stephen D. Stamboulieh
Counsel for Plaintiffs