

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

CARL HIGBIE, JOSEPH HARRIS, and  
MICHAEL VOTRUBA,

Plaintiffs,

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. KRAPP, in his  
Official Capacity as the Sheriff of Columbia  
County, New York, and JOHN DOES 1-10,

Defendants.

**NOTICE OF OPPOSITION AND REPLY  
TO DEFENDANT'S CROSS-MOTION FOR  
SUMMARY JUDGMENT**

Civil Action No. 1:24-cv-00174-MAD-TWD

**PLEASE TAKE NOTICE**, Plaintiffs Carl Higbie, Joseph Harris, and Michael Votruba, by and through their attorneys of record, file the accompanying Memorandum in Opposition to Defendant James' Cross-Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Summary Judgment; the Declaration of Counsel with its annexed exhibits; and Plaintiffs' Response to Defendant's Statement of Material Facts, in further support of their Motion for Summary Judgment and in opposition to Defendant's Cross-Motion for Summary Judgment.

**Dated: February 21, 2025.**

Respectfully submitted,

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**Certificate of Service**

I, Stephen D. Stamboulich, 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: February 21, 2025

/s/ Stephen D. Stamboulich  
Counsel for Plaintiffs