

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

DAVID FLOYD, et. al.,

X

Plaintiffs, 08 Civ. 1034 (AT)

-against-

THE CITY OF NEW YORK,

Defendant.

**DECLARATION IN SUPPORT
OF MOTION FOR
MODIFICATION OF
REMEDIAL ORDER**

X

JAENEAN LIGON, et al.,

X

Plaintiffs, 12 Civ. 2274 (AT)

-against-

THE CITY OF NEW YORK, et. al.,

Defendants.

**DECLARATION IN SUPPORT
OF MOTION FOR
MODIFICATION OF
REMEDIAL ORDER**

X

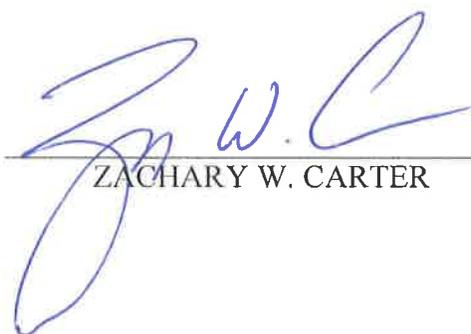
ZACHARY W. CARTER declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Corporation Counsel of the City of New York, attorney for defendants-appellants the City of New York, et al. (the "City") in the above-captioned cases.
2. This declaration is submitted in support of the parties' joint application to modify the remedies opinion issued on August 12, 2013 ("Remedial Order") in the above-captioned matters.
3. The City is committed to reforming its stop-and-frisk policies and practices as provided in the Remedial Order.

4. Attached hereto as Exhibit A is a true and correct copy of the parties' proposed modification to the Remedial Order, which was jointly drafted by the parties, and to which all parties are in agreement.

5. If the Court approves the parties' proposed modification, the City will then move to withdraw its appeals in *Floyd* and *Ligon* with prejudice. Upon withdrawal of the appeals, the City will proceed with the consultative processes for developing the Immediate and Joint Process Reforms in *Floyd* and injunctive relief in *Ligon* set forth in the Remedial Order.

Dated: New York, New York
April 3, 2014



ZACHARY W. CARTER