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September 6, 2023

Hon. Thomas Buchanan  
Schenectady County Supreme Court  
County Judicial Building  
612 State St., 2nd Floor  
Schenectady, New York 12305

Re: Chambers v. Broadalbin-Perth Central  
School District  
Index No.: 202008421  
Our File: 800-2295

Dear Justice Buchanan:

Pursuant to your directive I am writing to provide a brief status update with regard to Chambers v. Broadalbin-Perth Central School District.

Plaintiff alleges that he was sexually assaulted and abused by teacher Elizabeth Munn during the end of his 8<sup>th</sup> grade year through the summer and the beginning of his 9<sup>th</sup> grade year. Plaintiff alleges that the abuse took place on and off school grounds. Plaintiff's Complaint asserts causes of action of negligent supervision and monitoring in addition to negligent hiring and retention. The deposition of the Plaintiff has been completed and we are in the process of scheduling the deposition of a representative from the School District. It is the position of the Defendants that there was no notice to the School District of the alleged conduct of the teacher and that all appropriate actions and inquiries were made at the time of the hiring and evaluation of the accused teacher. There has been no settlement discussion and, to our knowledge, no settlement demand made to date. If a demand is made, we will assess whether mediation is a viable option.

If you have any questions in this regard, please do not hesitate to contact our office at your convenience.

Very truly yours,

THE MILLS LAW FIRM, LLP

BY: *Michelle M. Kulak*  
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