

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF RENSSELAER

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T.T.,

Plaintiff,

**AFFIRMATION IN SUPPORT  
OF ORDER TO SHOW CAUSE**

-against-

HOOSIC VALLEY CENTRAL SCHOOL DISTRICT,

Index No. \_\_\_\_\_

Defendant.

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JEFF HERMAN, ESQ., an attorney duly admitted to practice before the Courts of the State of New York, hereby affirms the truth of the following, under penalty of perjury pursuant to the CPLR:

1. I am an attorney with the law firm of Herman Law, attorneys of record for the Plaintiff. I am familiar with the facts and circumstances surrounding this action.

2. I submit this Affirmation in support of the Application for Order to Show Cause to allow this case to be filed and prosecuted by Plaintiff using a pseudonym, consisting of the Plaintiff's initials instead of the Plaintiff's full name.

3. Plaintiff brings this action pursuant to the New York Child Victims Act, CPLR § 214-g. The Plaintiff will be required to disclose matters of the utmost intimacy in this action, consisting of one or more incidents of child sexual abuse.

4. Given that this action concerns child sexual abuse, Plaintiff's privacy interest outweighs the general presumption of openness in judicial proceedings.

5. Plaintiff seeks to use a pseudonym for purposes of court filings and the public record. The use of a pseudonym for Plaintiff, consisting of his initials, will not materially hamper the Defendants in their defense of this action, as Plaintiff's counsel will disclose to Defendants the

full name of Plaintiff.


6. Plaintiff fears further psychological injury if Plaintiff's identity as a victim of child sexual abuse were to become known as a matter of public record.

7. In accordance with CPLR § 2217(b), the Affiant states that there has been no prior motion for the relief sought herein or any similar relief.

WHEREFORE, it is respectfully requested that this Application for Order to Show Cause be granted, that Plaintiff be allowed to proceed in this action using the pseudonym of his initials, and such other and further relief as is just and proper.

Dated: New York, NY  
August 9, 2021

By: \_\_\_\_\_

  
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