

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF RENSSELAER

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T.T.,

Plaintiff,

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

-against-

HOOSIC VALLEY CENTRAL SCHOOL DISTRICT,,

Index No. _____

Defendants.

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Plaintiff, [REDACTED] in the above-named action, being duly sworn, deposes and states:

1. I am the Plaintiff in this action against Defendants. 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 my initials instead of my full name.
2. I bring this action pursuant to the New York Child Victims Act, CPLR § 214-g. I will be required to disclose matters of the utmost intimacy in this action, consisting of one or more incidents of child sexual abuse. Given that this action concerns child sexual abuse, my privacy interest outweighs the general presumption of openness in judicial proceedings.
3. I seek to use a pseudonym for purposes of court filings and the public record. The use of a pseudonym, consisting of my initials, will not materially hamper the Defendants in their defense of this action, as my counsel will timely disclose to Defendants my full name and other identifying information. I am solely requesting that my identity not be included in public filings in this case.
4. The acts of sexual abuse forming the basis of this lawsuit have caused me severe emotional and distress. I reasonably fear further psychological injury, stress and trauma if my identity as a victim of child sexual abuse were to become known as a matter of public record. The allegations contained in this lawsuit involve information of the utmost intimacy. I am personally embarrassed by the allegations in the lawsuit.

- 5. I wish to keep my name out of local and national news publications that are accessible to my family (including my children), friends, employer, and co-workers who live and work within the state and have access to local and national new publications. I genuinely fear my past abuse will be the topic of conversation at work and amongst my family and friends.
- 6. My identity as a plaintiff in this lawsuit has been kept confidential. To the best of my knowledge, there is no other mechanism I can pursue to secure and ensure anonymity without seeking leave from the Court.
- 7. If I am not allowed to proceed under a pseudonym in this lawsuit, and have to use my real name, I do not know if I would proceed with the lawsuit.

By: _____
[REDACTED]
 T.T.

State of New York
 County of Rensselaer
 I, Jermaine D McCall, a Notary Public, do hereby certify that on this
 ___ day of June 2021, personally appeared before me, [REDACTED] known to me
 to be the person whose name is subscribed to the foregoing instrument.


 Notary Public

My Commission Expires 12/22/22
 Page 2 of 2

JERMAINE D MCCALL
 Notary Public, State of New York
 Registration No. 01MC6316976
 Qualified in Rensselaer County
 Commission Expires 12/22/2022