

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

Superior Court for Suffolk County

Ronald Geddes, AC, and RAR,
on their own behalf and
on behalf of a class of similarly situated
individuals,

Plaintiffs,

v.

City of Boston; Boston Police Department;
Boston Public Health Commission; Kim M.
Janey, in her capacity as the Mayor of the City of
Boston and individually; Gregory P. Long, in his
Capacity as the Acting Commissioner of the
Boston Police Department and individually; and
Bisola Ojikutu, in her capacity as Executive
Director of the Boston Public Health Commission
and individually,

Defendants.

Civil Action No. 2184CV2609
On transfer by Second Interim Order in
SJ-2021-0408

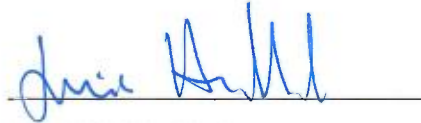
AFFIDAVIT OF JAMIE N. HADDAD

I, Jamie N. Haddad, state that the following is a true and accurate statement to the best of my knowledge and belief:

1. I am a 2021 graduate of Boston College Law School and am currently employed by the law firm of Wilmer Cutler Pickering Hale and Dorr LLP.
2. On Tuesday, November 9, 2021, I listened to and transcribed an interview between Tiziana Dearing of WBUR and Radio Boston, Deborah Becker of WBUR, and Marty Martinez, Chief of Health and Human Services of the City of Boston, regarding the City's removal efforts in the area around the intersection of Massachusetts Avenue and Melnea Cass Boulevard in the City of Boston.
3. That interview is posted on WBUR's public website at <https://www.wbur.org/radioboston/2021/11/08/latest-on-mass-and-cass>.

4. I have attached as Exhibit A my informal transcript of that interview, which is a true and accurate representation of the recording as I heard it.
5. On November 16, 2021, I watched a video clip from a press conference with the then-Acting Mayor of Boston, Kim M. Janey, posted by Boston City TV.
6. That clip is available at https://www.youtube.com/watch?v=C6S7T_9HS6A&t=647s
7. I have attached as Exhibit B a transcript of the clip, which is a true and accurate representation of the recording as I heard it.

Signed under the pains and penalties of perjury on November 16, 2021.



Jamie N. Haddad