

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
JACOB TEITELBAUM, individually and as father
To CHILD A and CHILD B,

Plaintiff,

-against-

**ATTORNEY
DECLARATION**

12 CIV 2858 (VB)

JUDA KATZ; CHAYA KATZ; JOEL TENNENBAUM;
BLUMA TENNENBAUM; DAVID RUBENSTEIN;
KIRYAS JOEL COMM. AMBULANCE CRP;
DISTRICT FAMILY COURT OF ORANGE COUNTY
9th JUDICIAL DISTRICT; HON. ANDREW P.
BIVONA; ATTY. MARIA PETRIZIO; CHILDREN'S
RIGHTS SOCIETY OF ORANGE COUNTY; ATTY
KIM PAVLOVIC; ATTY JOHN FRANCIS X. BURKE;
CHILD PROTECTIVE SERVICES OF ORANGE
COUNTY; DEPARTMENT OF SOCIAL SERVICES OF
ORANGE COUNTY; CHRISTINE BRUNET; ATTY
STEPHANIE BAZILEOR; JOHN DOES 1 THROUGH 95;
JANE DOES 1 THROUGH 20,

Defendants.

-----X
DAVID L. DARWIN, an attorney duly admitted to practice law before the United States
District Court for the Southern District of New York, declares the following to be true under
penalties of perjury pursuant to 28 U.S.C. §1746:

1. I am the Orange County Attorney, the attorney for Defendants, COUNTY OF
ORANGE, CHRISTINE BRUNET and STEPHANIE BAZILE. I am fully familiar with the
prior proceedings and papers filed in this action and I submit this Declaration in opposition to
plaintiff's "Motion for Intrinsic Fraud Inquest."

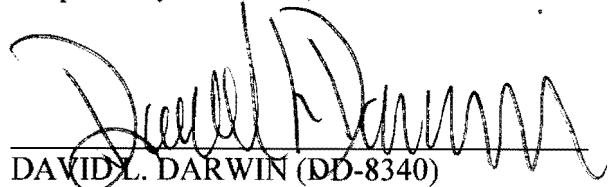
2. Plaintiff's motion contains not a single allegation against the defendants that would warrant the relief sought by plaintiff, nor is there any factual basis for such relief contained in the Amended Complaint or anywhere else in the record before this Court.

3. Accordingly, and for the reasons stated in the opposing affirmations/declarations of Terence S. Hannigan, Esq., attorney for defendant Rubenstein, Jeffrey B. Siler, Esq., attorney for Kiryas Joel Ambulance Corp. and Gregg D. Weinstock, Esq., attorney for Maria Patrizio, and upon the authorities cited therein, all of which are incorporated by reference herein, plaintiff's motion should be denied as completely meritless.

WHEREFORE, the defendants COUNTY OF ORANGE, CHRISTINE BRUNET and STEPHANIE BAZILE request an order of this Court denying plaintiff's motion in all respects.

Dated: Goshen, New York
June 13, 2013

Respectfully submitted,



DAVID L. DARWIN (DD-8340)

Attorney for Defendants
COUNTY OF ORANGE,
STEPHANIE BAZILE and
CHRISTINE BRUNET
15 Matthews Street, Ste. 305
Goshen, New York 10924
(845) 291-3150