

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Rafaela Espinal f/k/a Rafaela Espinal-Pacheo,

**AFFIDAVIT OF
SAMANTHA J.
WILLIAMSON**

Plaintiff,

- against -

Index No. 151246/2021

New York City Department of Education, Richard Carranza, Chancellor of the New York City Department of Education Individually, Cheryl Watson-Harris, Former First Deputy Chancellor of the New York City Department of Education Individually, David Hay, Ursulina Ramirez, New York City Department of Education Chief Operating Officer Individually and "John Does" and "Jane Does" 1-25 whose names are currently unknown,

Defendant.

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STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

SAMANTHA J. WILLIAMSON, being duly sworn, deposes and says:

1. I am a Paralegal in the Labor and Employment Law Division of the Office of the Corporation Counsel of the City of New York. As such, I am fully familiar with the facts and circumstances set forth herein based upon a review of the records maintained by the Office of the Corporation Counsel and the Office of the Comptroller of the City of New York ("Comptroller's Office").

2. I submit this affidavit in support of the defendant's motion to dismiss the complaint in this action.

3. The Comptroller's Office is designated to receive notices of claims on behalf of the New York City Department of Education. Such notices, when received by the

Comptroller's Office, are entered into a database known as the Omnibus Automated Image Storage and Information System ("OAISIS"), which is maintained by the Comptroller's Office.

4. Our office has access to this database on remote terminals.

5. Pursuant to a request from Assistant Corporation Counsel Nicholas L. Collins on April 30, 2021, I conducted a name search of the OAISIS database in order to verify whether the Comptroller's Office was served with any notices of claim on behalf of the above plaintiff, Rafaela Espinal-Pacheco.

6. This search revealed that no notice of claim was filed on behalf of Rafaela Espinal-Pacheco, or any other variation thereof, as of April 30, 2021.

Samantha J. Williamson
SAMANTHA J. WILLIAMSON

Sworn to before me this
30th day of April, 2021

Misael Montas
NOTARY PUBLIC
Pursuant to Executive
Order 202.7

