

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

SUNDEEP SINGH SUCHDEV, LUCAS SHAPIRO,
SHRUTI PAREKH, JESSICA TURNER, LILI
SALMERON, and SANJEEVAN THARMARATNAM

Plaintiffs,

-against-

JUDITH GRUNBAUM, MOSHE DEUTSCH, SAMUEL
GRUNBAUM, and YHT MANAGEMENT INC.

Defendants.

Index No. _____

**AFFIDAVIT OF SHURTI
PAREKH**

STATE OF NEW YORK }
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COUNTY OF KINGS }

SHRUTI PAREKH, being duly sworn, deposes and says the following is true:

1. I have resided in the Second Floor, Front Room (with Alcove) (“my room”) of 70 South Elliott Place, Brooklyn, NY 11217 (“Subject House”) since 2016.¹
2. I am also in a long-term romantic relationship with Plaintiff Sundeep Singh Suchdev (“Sonny Singh”), who has a room on the top floor. We sometimes sleep in his room and sometimes in my room.
3. I first started residing in the Subject House in or around 2015 as a roommate of Sonny’s.
4. My monthly rent for my room was set by the New York State Division of Homes and Community Renewal (“DHCR”) at \$300.00 per month in 2017.
5. Because of ongoing litigation, the owner has not asked for or accepted rent. Accordingly, I put my money in escrow each month at the rate of \$300.00 per month.
6. The owner and her agents know I live in the Subject House and in the Second Floor, Front Room.
 - a. I made a formal request through my attorney in 2016 to move into the Second Floor/Front Room;

¹ Note: because the Subject House has a garden level, at times, my room is referred to as the second floor, and other times, the third floor. Either way, I am on the second level from the top floor.

- b. My name has appeared in the owner's use case that was filed against many of the Petitioners (*see* Exhibit D);
 - c. In 2017 and 2018, I was involved in an HP Action to get repairs in the common areas and in my room. A settlement listing my name and my room was signed by the owner's attorney (*see* Exhibit F & G).
 - d. In December 2019, I came to the owner's office to pick up a copy of the key and signed my name on a document regarding my occupancy of the room (*see* Exhibit I).
7. When the COVID-19 pandemic first started, I was a student out of state, and did not think it would be safe to return for several months. At the time, Sonny was visiting me and also stuck out of state.

Videos Surveillance

8. When we finally returned to the Subject House on August 10, 2020, there were surveillance cameras inside the interior of the Subject House, and we were receiving constant visits from Samuel Grunbaum ("Mr. Grunbaum"), who purported to be the son of the owner, Judith Grunbaum ("Ms. Grunbaum"). Prior to August 2020, I had never seen Mr. Grunbaum before and Ms. Grunbaum had owned the House since 2015
9. Based on the make and model of the cameras, we believe they can pick up views 110 degrees from where they are situated, and can use infrared technology to pick up images at night. We are also concerned they may be able to pick up audio because the camera appears to have the capability. *See* Exhibit O
10. The video cameras are installed throughout the interior of the house on all four (4) floors. They appear to watch movement in and out of all bedrooms and bathrooms. There is also a camera outside the house on the façade, surveilling the entrance of the Subject House.
11. The video surveillance makes me incredibly uncomfortable and feel unsafe in my home.

First Lock Out

12. On September 2, 2020 at around 5:00pm, I was working in my room on my laptop when I heard the doorbell ring. I came down and saw workers on the stoop. One worker was sitting and one worker was standing. The worker who was sitting had a lock his lap. When I stepped outside to ask what work they intended to do, they told me they had come to a lock room. I told them they could not lock a room without a court order. They then called a representative of YHT Management Inc. and Mr. Grunbaum arrived almost immediately.
13. Mr. Grunbaum came up the stoop, yelled, and barged into the Subject House with the workers. Throughout this, I orally protested that locking a room without a court order was not legal. As Mr. Grunbaum climbed the steps to my floor, Sonny joined us and he also protested.
14. When we arrived at my room, Mr. Grunbaum ordered me to leave my room so he could secure it. He only let me quickly grab the laptop I was working on and a few other items.
15. The Plaintiffs and I contacted the police (“NYPD”). The NYPD officer arrived after Mr. Grunbaum and his workers had already secured the room with a padlock and left. The NYPD officer stated I could break the lock myself, if I wished but I did not know how to do that. My belongings were in the room and the light was left on when Mr. Grunbaum and the worker locked the door. *See Exhibit P*
16. Also, on September 2, 2020, while Mr. Grunbaum was going up the steps to lock my room, I heard Mr. Grunbaum falsely claim that Sonny had previously assaulted his mother, Ms. Grunbaum, who owns the Subject House and is an elderly white woman.
17. When asked why he locked the room, Mr. Grunbaum claimed he saw a person who had been sleeping in that room leave with suitcases and therefore decided to secure the room.
18. The person sleeping in the room was a house guest of Lucas Shapiro (“Lucas”), another Plaintiff in this case. Lucas’ guest from Turkey, and had been staying in his bedroom as a guest. Given the COVID-19 pandemic, the Plaintiffs agreed she could extend her stay and quarantine here.

19. Because Sonny and I were out of state and could not return due to the COVID-19 pandemic, everyone agreed that Lucas' guest could move from Lucas' room and sleep in my room until it was safe for her to find another place to stay.
20. When Sonny and I returned to New York on August 10, 2020, Lucas' guest found other accommodations, and left with a suitcase on September 1, 2020. Mr. Grunbaum stated he viewed her exit, with her suitcases, on the security cameras. He also stated he had only seen me sleep in Sonny's room.

Max's Visit

21. I was also present when a man identifying himself only as "Max" came into the Subject House without notice on September 8, 2020 around 5:20pm. Max was thinner than Mr. Grunbaum, in his 30s, and wearing a yarmulke. When I asked who he was, he said that he worked for Mr. Grunbaum. I had never seen Max before but he let himself in the Subject House with a key. I watched him go up the stairs to my locked room while I was in the living room studying. I was studying in the living room because I had been locked out of my room.
22. Sonny and I followed Max and saw him use a key to open the door to my room. Max then recorded video and took photos of my belongings on his phone. He also opened drawers and took photos of my belongings inside the drawers. I protested that he should not touch my belongings but he did not stop taking photos or video.
23. When I stepped into my room during Max's visit, he ordered me to leave, locking me out again and not allowing me to remove any further belongings. He stated, "You can't step in over here. Excuse me you have to go out" or words to that effect. Max then left, shut the light off at my request, and locked the room again.
24. On September 11, 2020, after consulting with our local police precinct, NYPD Officer Kinney came to the Subject House, and escorted me and other Plaintiffs up to my room. He gave us permission to break the lock and stood there when we did it. He instructed us to call 911 if the Defendants came back to lock the room again.

September 15, 2020 Lock Out Attempt

25. On September 15, 2020 at about 7:00pm, while it was nearly dark, a man wearing a red shirt, baseball cap, and ponytail walked into the Subject House with a key. The man did not identify himself by name and went up to my room to try to lock it. We called 911.
26. Two officers responded and came to my room. Shortly thereafter, Mr. Grunbaum also came to my room, where he argued with officers and asked to speak to a supervisor. Another associate or two of Mr. Grunbaum waited outside the Subject House.
27. A supervisor named Lieutenant Leone responded with two (2) more officers. By this time, there were five (5) NYPD officers, Mr. Grunbaum and several Plaintiffs crowded in my room or in the hallway outside my room. Sonny and I asked if we could meet outside due to COVID-19 but we were instructed to stay. This felt very unsafe.
28. Lt. Leone heard out all parties. He told Mr. Grunbaum that if he tried to lock me out again, he could face arrest. Lt. Leone also explained that Mr. Grunbaum could not lock me out without a Court Order. The NYPD left the Subject House around 8:30pm but Mr. Grunbaum and several of his agents remained outside for another hour.
29. Mr. Grunbaum argued with the NYPD officers outside the front of the house, drove off but then circled back and told two of his associates to “make yourself comfortable” outside the Subject House. Two men—the man in the redshirt and baseball cap and another man I’d never seen before—waited outside the house for an additional hour or so. The two men sat on our neighbor’s stoop, potentially to avoid view of the surveillance cameras outside the Subject House. They did not leave until after 9:00pm—more than 2 hours after this ordeal started. When they did leave, they ominously told Lucas that they would be back.
30. Afterwards, I felt exhausted, terrified, and like I could not continue to defend my home like this. I couldn’t sleep well that night because I felt the two men who had been instructed to stay were there to intimidate us, and also had the keys to the house. I was worried they would enter the house in the middle of the night.

Unnoticed Visits

31. Mr. Grunbaum and his agents come to the Subject House extremely frequently without notice. We have to constantly have masks on our chin or around our ears so we do not expose ourselves to their outside germs. Agents of Defendants come on Sundays and after business hours as well as during the day. Specifically, I recall recent visits on or about:
- a. August 25, 2020: Samuel and a worker came to do some work throughout the house on the security cameras. I asked them to let us know next time they come, and they refused;
 - b. August 27, 2020 (from more than two hours— 4:00pm-6:40pm);
 - c. August 30, 2020 (around 6:25pm-6:50pm) (this was a Sunday);
 - d. August 31, 2020 around 3:00pm;
 - e. September 2, 2020 at 5:00pm for the first lock out;
 - f. September 3, 2020 at 11:10am;
 - g. September 4, 2020 at 11:50 am until 12:25pm
 - h. September 8, 2020: Max came by at 5:10pm to take photos and videos of my belongings. He forced me out of my own room and locked the door again.
 - i. September 15, 2020: The third lock out with several agents between 7pm-9:30pm.
32. At times, Mr. Grunbaum is often very aggressive and intimidating. We also believe Mr. Grunbaum or other agents of Defendants may come by when we're not home and/or enter unnoticed at times.
33. Because Mr. Grunbaum and his agents come to the property without notice, often outside of business hours or on Sundays, I feel unsafe in the Subject House even on the weekends and at night. I believe that Mr. Grunbaum has been sent by the landlord to harass me and the other Plaintiffs so that we will surrender our apartments. I fear they will lock out other Plaintiffs as well.
34. As a woman, I feel incredibly unsafe having strange men coming in and out of the Subject House, entering my room, and looking through my belongings. I feel this is particularly unsafe in light of the COVID-19 pandemic. I also feel humiliated by the

constant surveillance of my movements. I am embarrassed that Defendants can see me come in and out of the bathroom at night or in my towel before and after a shower. Mr. Grunbaum has made clear he knows how often I sleep with my partner, Sonny. I do not think my romantic relationship is any of his business and I feel embarrassed by these comments.

35. I ask the Court to grant all relief requested herein so that Plaintiffs can feel safe in their home and I live in my home without worry that the Defendants will lock me out without a court order.

WHEREFORE, I respectfully request that the Court grant Plaintiffs' Order to Show Cause, all the relief herein requested, and all the relief this Court deems just and proper.


SHRUTI PAREKH

Sworn to before me on the
18th day of September 2020


Notary Public

