

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ROCKLAND

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EVE MANCUSO, TERI GABEL,
RAYMOND KOZMA, SUZANNE ROCHELEAU,
SUSANNE FLOWER, and the NEW YORK
CHAPTER, INC. OF THE
ADIRONDACK MOUNTAIN CLUB, INC.,

Index No. _____/21

Petitioners/Plaintiffs,

AFFIRMATION OF
JUDITH BACHMAN, ESQ.

v.

ADIRONDACK MOUNTAIN CLUB, INC.,

Respondent/Defendant.
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I, Judith Bachman, am an attorney admitted to practice in the State of New York and an attorney at The Bachman Law Firm PLLC, attorneys for Petitioners/Plaintiffs EVE MANCUSO, TERI GABEL, RAYMOND KOZMA, SUZANNE ROCHELEAU, SUSANNE FLOWER, and the NEW YORK CHAPTER, INC. OF THE ADIRONDACK MOUNTAIN CLUB, INC. (“NY ADK”), (“Petitioners/Plaintiffs”) in the above-captioned action.

1. I am fully familiar with the facts set forth herein.
2. I submit this affirmation in support of Petitioners/Plaintiffs’ (i) motion, brought by order to show cause, and (ii) petition, brought pursuant to Article 78 and common law, for the following relief:

- (i) Enjoining and restraining Respondent/Defendant from dissolving NY ADK as a chapter of ADK and a corporation organized and existing under the laws of the State of New York; establishing a new, unincorporated chapter for the benefit of existing and new members; eliminating the Board and Officer positions of NY ADK; expelling the individual Petitioners/Plaintiffs’ from membership with ADK; expelling the individual Petitioners/Plaintiffs’ from membership with NY ADK; and revoking the individual Petitioners/Plaintiffs’ authority to act on behalf of NY ADK, including any enjoyment or decision-making as it relates to Camp Nawakwa and the direction of funds or financial accounts belonging to NY ADK; and

- (ii) restoring Petitioners/Plaintiffs to their status and rights as they were prior to June 26, 2021, including, but not limited to, restoring the individual Petitioners/Plaintiffs to their membership in NY ADK and restoring ADK and NY ADK as a chapter of ADK and being allowed to operate in the ordinary course including **preserving the health and safety of members** and the public and supervising camp usage.
3. Pending the hearing of this motion, Petitioners/Plaintiffs also seek an order:
 - (i) Enjoining and restraining Respondent/Defendant from taking any action with regard to dissolution of NY ADK, termination of membership of members of NY ADK, and any further interference with, or actions taken to the detriment of NY ADK or its members, officers or directors; and
 - (ii) restoring Petitioners/Plaintiffs to their status and rights as they were prior to June 26, 2021, including, but not limited to, restoring the individual Petitioners/Plaintiffs to their membership in NY ADK and restoring ADK and NY ADK as a chapter of ADK and being allowed to operate in the ordinary course including **preserving the health and safety of members** and the public and supervising camp usage.
4. On July 1, 2021, at 9:47 a.m., I notified Respondent/Defendant by emailing its Executive Director, Michael Barrett, its President, Thomas Andrews, and its Secretary, Virginia Etu, at their last known email addresses, respectively (providing at least twenty-four (24) hours' notice) of my intent to bring this motion by order to show cause containing a TRO. A true and correct copy of my notice email is attached hereto as Exhibit 1.
5. Besides this application, no other application for the relief requested herein has been made to this or any other Court.

Dated: New City, New York
July 1, 2021

_____/s/_____
Judith Bachman