

February 22, 2018

VIA HAND DELIVERY

Mr. Janusz R. Richards
Village Clerk
222 Grace Church Street
Port Chester, New York 10573

Re: Request for Proposals, Special Elections Counsel

Dear Mr. Richards:

This letter is in response to the Request For Proposals (“RFP”) for a Special Elections Counsel. As more fully set forth below and in my resume submitted herewith, I am an experienced voting rights attorney with both trial and appellate experience. I have also served as special counsel to the City of New Rochelle and rendered an opinion as to whether the City’s proposed redistricting plan was consistent with the requirements of the Voting Rights Act of 1965. My contact information at Newman Ferrara LLP is listed above. I am Of Counsel and Co-Chair of the Civil Rights Practice Group at the firm.

With respect to resources to assist in the performance of the work required under the RFP, my practice group consists of Debra S. Cohen, Esq. (Co-Chair, Civil Rights Practice Group), Danielle Sullivan, Esq. (Senior Associate), Frank Foster, Esq. (Associate), and a team of law student interns and externs. Additionally, our team is fully available to meet and consult with the Board of Trustees in connection with the work to be performed. The hourly rates for the attorneys who will be assigned to this contract are as follows: Randolph M. McLaughlin - \$500; Debra S. Cohen - \$450; Danielle Sullivan - \$325; Frank Foster - \$300.

Please be advised that no disciplinary action has been taken or has been pending against the firm or any partner during the past three years with any state regulatory body or professional organization. The firm has conducted a conflicts search, and the firm and partners have no conflicts of interest that would preclude the firm’s retention.

Below are three professional references:

1. Frederick K. Brewington, Esq.
Law Offices of Frederick K. Brewington
556 Peninsula Blvd.
Hempstead, New York 11550
516-489-6959

Mr. Janusz R. Richards

February 22, 2018

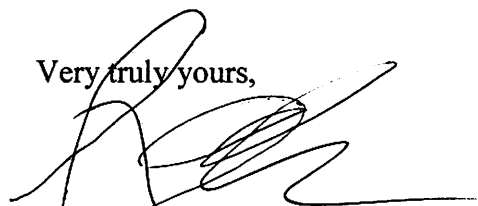
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2. Professor Jay C. Carlisle
Pace Law School
78 North Broadway
White Plains, New York 10603
914-422-4234

3. David N. Yaffe, Esq.
Hamburger, Maxson, Yaffe & McNally, LLP
225 Broad Hollow Road, Suite 301E
Melville, New York 11747
914-694-2400

If you need anything additional with respect to this submission, please advise me at your earliest convenience.

Very truly yours,



Randolph M. McLaughlin

RANDOLPH M. MCLAUGHLIN
1250 Broadway, 27th Floor
New York, New York 10001
212-619-5400

EDUCATION: Harvard Law School, J.D., May 1978
Columbia University, B.A., May 1975

BAR ADMISSIONS: Admitted to New York State Bar, Supreme Court of the United States, United States Courts of Appeals for the Second and Fifth Circuits, United States District Courts for the Southern and Eastern Districts of New York.

**LEGAL
EXPERIENCE:**

September 2011 to
present Newman Ferrara LLP
New York, New York

Of Counsel
Co-Chair, Civil Rights Practice Group
Responsible for the litigation of civil rights cases and class actions in federal and state courts.

December 2008 to
September 2011 Harwood Feffer LLP
New York, New York

Of Counsel
Responsible for the litigation of civil rights cases involving employment discrimination, police misconduct and voting rights.

August 1988 to
present Pace University School of Law
White Plains, New York

Professor
Course coverage includes Civil Procedure, New York Practice, Labor Law, Civil Rights Law, Civil Rights Litigation, and Criminal Justice Seminar.

September 1996 to
June 2001 Social Justice Center
Pace University School of Law
White Plains, N.Y.

Director
Developed and implemented a community-based lawyering model for addressing issues concerning police-community relations, redistricting, and economic development.

September 1986 to
July 1988

Meyer, Suozzi, English & Klein, P.C.
Mineola, New York

Associate Attorney

Responsible for handling civil cases at trial and appellate levels.
Handled labor matters before the American Arbitration Association
and the National Labor Relations Board; drafted appellate briefs
involving labor disputes.

September 1978 to
September 1986

Center for Constitutional Rights,
New York, New York

Associate Legal Director/Staff Attorney

Responsible for the management and coordination of litigation by
CCR attorneys. Reviewed and made initial decisions on
recommendations of CCR attorneys with respect to new cases and
amicus curiae briefs. Duties also included handling civil rights/civil
liberties litigation at the trial and appellate levels.

PUBLICATIONS:

Racially Motivated Violence: Litigation Strategies. (1984).

*Bray v. Alexandria Women's Health Clinic: The Supreme Court's
Next Opportunity to Unsettle Civil Rights Law.*
66 Tulane Law Review 1357 (1992).

Chisom v. Roemer: Where Do We Go From Here?
24 Columbia Human Rights Law Review 1 (1993).

*Operation Rescue Versus A Women's Right to Choose:
A Conflict Without a Federal Remedy?*
32 Duquesne Law Review 709 (1994)

BOARDS:

February 2013 to
present

Chair, Board of Directors
Hale House Center, Inc.

September 2001 to
June 20, 2007

Member, Board of Trustees,
United Nations International School.

September 1993 to
September 1996

Member, Board of Directors,
Center for Constitutional Rights.

**SPECIAL
PROJECTS:**

- March 2004 Conducted study of practices and procedures of Rutgers University (Newark campus) Police Department.
- February 2000 Conducted study of practices and procedures of Tisbury, Ma. Police Department.
- December 1999 Worked with Danny Glover to address issues concerning diversity in the New York City taxicab industry.
- March 1999 Worked with members of the Board of Trustees of the Village of Ossining, community leaders, and the local police department to establish a police-civilian complaint review board.
- August 1979 Conducted human rights investigation in Liberia, West Africa.

AWARDS:

Myron Isaacs Community Service Award
New York Civil Liberties Union
Lower Hudson Valley Chapter, 2013

William Robert Ming Advocacy Award
National Association for the Advancement of Colored People
National Convention, 2001

Haywood Burns Memorial Award
New York State Bar Association, 1999

Foot Soldier's Award
National Association for the Advancement of Colored People
National Convention, 1999

Haywood Burns/Shanara Gilbert Award
Northeast People of Color Conference
Third Annual Conference, 1998

Outstanding Professor of the Year, 1992.
Pace University School of Law

**PARTIAL
LIST OF CASES:**

Chamberlain v. City of White Plains
12 CIV 5142 (S.D.N.Y.)

Representing Estate of Kenneth Chamberlain, Sr. in civil rights damage action against the City of White Plains and police officers who tased, shot and killed Mr. Chamberlain in his apartment. The officers were responding to a call for medical assistance.

Glover v. National Basketball Association
Index No. 114063/2011(Sup. Ct., N.Y. Co.)

Representing Warren Glover, a former director of security at the National Basketball Association, in an employment discrimination suit. The complaint alleges that Mr. Glover was subjected to a hostile work environment and discriminatory treatment by his supervisors as a result of his efforts to report and address sexual harassment and gender discrimination in his department.

United States v. Village of Port Chester
2008 WL 19052 (S.D.N.Y. 2008)

Represented Plaintiff-Intervenor in a suit brought by the United States against the Village alleging that the at-large election system utilized to elect members of the Village Board of Trustees violated the Voting Rights Act. The district court ruled that the system violated the Act and adopted a cumulative voting remedy.

New Rochelle Voter Defense Fund v. City Of New Rochelle
308 F. Supp. 2d 152 (S.D.N.Y. 2003)

Represented African-American voters in Voting Rights Act challenge to redistricting plan adopted by the City Council. After trial, the district court concluded that the plan violated the Voting Rights Act. The parties agreed to a new redistricting plan.

Campbell v. DiGuglielmo
148 F. Supp. 2d 269 (S.D.N.Y. 2001)

Represented the family of Charles Campbell who was killed during a dispute over a parking space at a deli in Dobbs Ferry, N.Y. Suit was filed against Richard B. DiGuglielmo, Richard D. DiGuglielmo, an off-duty New York City police officer, Robert Errico, the City of New York, and the deli corporation. The complaint alleged that the three individual defendants conspired to violate the civil rights of Mr. Campbell. A federal jury awarded the plaintiffs 5.2 million dollars in damages.

Goosby v. Town Board of the Town of Hempstead
180 F. 3d 476 (2nd Cir. 1999)

Represented a class of African-American and Latino voters in a Voting Rights Act challenge to the at-large election system utilized by the Town of Hempstead to elect the Town Board. The district court held that the at-large system violated the Voting Rights Act, and the decision was affirmed on appeal.

McSurely v. McClellan
753 F. 2d 88 (D.C. Cir. 1985)

Represented two civil rights leaders in a constitutional tort action against United States senator, senate investigator and Kentucky prosecutor in connection with the search and seizure of plaintiffs' personal papers. Jury returned a verdict of 1.6 million dollars. Court of Appeals dismissed the constitutional claims, but upheld the verdict under common law privacy grounds against investigator.

Crumsey v. Justice Knights of the Ku Klux Klan,
80 CIV 287 (E.D Tenn.1982)

Represented five African-American women in a suit seeking monetary damages and injunctive relief against a Chattanooga branch of the Klan under the Ku Klux Klan Act of 1871. The women were awarded \$535,000 in damages, and the Court issued an injunction against further Klan violence.