

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KELTON DAVIS, *et al.*, individually and
on behalf of a class of all others similarly
situated,

Plaintiffs,

-against-

THE CITY OF NEW YORK and NEW
YORK CITY HOUSING AUTHORITY,
Defendants.

10 Civ. 0699 (SAS)

ECF Case

NOTICE OF MOTION FOR CLASS CERTIFICATION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Class Certification; the accompanying Declaration of Matthew Moses, dated May 3, 2013, and the exhibits attached thereto, the Declaration of Nancy Rosenbloom, dated May 3, 2013; and all other papers and proceedings in this action, Plaintiffs will move this Court, before the Honorable Shira A. Scheindlin, at a date and time to be determined by the Court, for an Order, pursuant to Rules 23(a) and 23(b)(2) of the Federal Rules of Civil Procedure, to certify a class of all African-American and Latino New York City Housing Authority ("NYCHA") residents and/or family members, authorized guests or visitors of NYCHA residents, who, since January 28, 2007, have been or will be unlawfully stopped, seized, questioned, frisked, searched, and/or arrested for trespass by New York City Police Department officers in or around NYCHA residences, including on the basis of race and/or ethnicity, and a subclass of all members of the class who are also authorized NYCHA residents, and to appoint the NAACP Legal Defense and Education Fund, Inc., The Legal Aid Society, and

Paul, Weiss, Rifkind, Wharton & Garrison LLP as counsel for the class and subclass pursuant to Rule 23(g) of the Federal Rules of Civil Procedure.

Dated: May 3, 2013
New York, New York

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