

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

**PLAINTIFF'S
FRCP 26(A)(1)
INITIAL DISCLOSURES
10 CV 6353**

THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO, Tax Id. 873220, Individually and in his Official Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN NORTH GERALD NELSON, Tax Id. 912370, Individually and in his Official Capacity, DEPUTY INSPECTOR STEVEN MAURIELLO, Tax Id. 895117, Individually and in his Official Capacity, LIEUTENANT THEODORE LAUTERBORN, Tax Id. 897840, Individually and in his Official Capacity, LIEUTENANT JOSEPH GOFF, Tax Id. 894025, Individually and in his Official Capacity, SGT.FREDERICK SAWYER, Individually and in his Official Capacity, SERGEANT KURT DUNCAN, Shield No. 2483, Individually and in his Official Capacity, LIEUTENANT CHRISTOPHER BROSCART, Tax Id. 915354, Individually and in his Official Capacity, LIEUTENANT RAFAEL MASCOL, Tax Id. 901927, Individually and in his Official Capacity, LIEUTENANT TIMOTHY CAUGHEY, Tax Id. 885374, Individually and in his Official Capacity, SERGEANT STEVEN WEISS Tax Id. 924615, Individually and in his Official Capacity, SERGEANT SHANTEL JAMES, Shield No. 30004, Individually and in her Official Capacity, DEPUTY COMMISSIONER PAUL BROWN, Individually and in his Official Capacity, and P.O.'s "JOHN DOE" #1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown) (collectively referred to as "NYPD defendants"), JAMAICA HOSPITAL MEDICAL CENTER, DR. ISAK ISAKOV, Individually and in his Official Capacity, DR. LILIAN ALDANA-BERNIER, Individually and in her Official Capacity and JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEE'S "JOHN DOE" # 1-50, Individually and in their Official Capacity (the name John Doe being fictitious, as the true names are presently unknown),

Defendants.
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PLEASE TAKE NOTICE that plaintiff Adrian Schoolcraft, pursuant to Federal Rule of Civil Procedure 26(a)(1), upon information and belief, hereby submits his initial disclosure as follows:

- (a) **Individuals Likely to Have Discoverable Information:** Plaintiff Adrian Schoolcraft, Larry Schoolcraft, Deputy Chief Michael Marino, Deputy Inspector Steven Mauriello, Lieutenant Theodore Lauterborn, Lieutenant Joseph Goff, Sgt. Frederick Sawyer, Sergeant Kurt Duncan, Lieutenant Christopher Broschart, P.O. Arthur Sadowski, P.O. Raymond Miller, Lieutenant Rafael Mascol, Lieutenant Gene Delafuente, Lieutenant Timothy Caughey, Sergeant Steven Weiss, Sgt. Raymond Stukes, Sergeant Shantel James, Sergeant Rasheena Huffman, P.A.A. "Jane" Boston, Commissioner Raymond Kelly, Deputy Commissioner Paul Browne, Assistant Chief Patrol Borough Brooklyn North Gerald Nelson, Captain Brandon Del Pozo, Chief of the Internal Affairs Bureau Charles Campisi, Chief Michael Scagnelli, P.O. David Velez, Sergeant Roger Lurch, Sgt. Andrew Cunningham, Sgt. John Deodato, Jr., Lt. David Durk (ret'd), Captain Alex Perez, Catherine Lamstein, Ph.D., Joseph Cuffio, M.D., Isak Isakov, M.D., Lilian Aldana-Bernier, M.D., Ted Stretmoyer and Carol Stretmoyer.
- (b) **Relevant documents:** Plaintiff's hospital records from Jamaica Hospital Medical Center (Exhibit A), Audio Recording of the "Home Invasion" into Adrian Schoolcraft's home on October 31, 2009 (Exhibit B), Audio Recording of the conversation between Larry Schoolcraft and Captain Theodore Lauterborne on October 31, 2009 (Exhibit C); and Arbitrator Bonnie Weinstock's decision from In the Matter of P.B.A. v. City of New York, Case # A-10699-04, striking down the NYPD's quota policy as unlawful (Exhibit D).
- (c) **Itemized Damages:**
N/A
- (d) **Insurance:** There are no insurance agreements relevant to this action.

Dated: New York, New York
May 11, 2011

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