



Lourdes M. Rosado
President and General Counsel

March 16, 2024

The Hon. Jessica G. L. Clarke
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Via ECF

Re: Response to Motion

Dear Judge Clarke,

Through undersigned counsel, Plaintiff SeanPaul Reyes responds to Defendant's motion that he be required to present government-issued identification in order to exercise his rights under the injunction.

Plaintiff is perfectly willing to confirm his identity through his public videos. Before recording in a precinct, he agrees that an NYPD officer review a video and confirm that Mr. Reyes is who he says he is. But he does not consent to the specific requirement that he prove his identity through a government-issued identification, based on concerns about requiring government ID to exercise rights.

Proving his identity through the use of his videos will be more reliable and less intrusive than requiring government ID.

Sincerely,

/s/ Andrew Case

Andrew Case
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