

# Exhibit L

UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

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DAVID FLOYD, *et al.*,

Plaintiffs-Appellees,

-against-

THE CITY OF NEW YORK,

Defendant-Appellant.

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**Docket No. 13-3088**

**DECLARATION IN  
OPPOSITION TO  
MOTION TO STAY**

**DECLARATION OF FAHD AHMED IN SUPPORT OF  
PLAINTIFFS-APPELLEES' OPPOSITION TO DEFENDANT'S-APPELLANT'S  
MOTION FOR STAY**

I, Fahd Ahmed, pursuant to 28 U.S.C. §1746 and subject to the penalties of perjury, that the following is true and correct:

1. I submit this affidavit in support of Plaintiffs-Appellees' opposition to Defendant-Appellant's Motion to Stay the Court's Remedies Opinion and Order in the above captioned matter. I am not a party to the above-captioned case.

2. I am the Legal and Policy Director for Desis Rising Up and Moving (DRUM). DRUM is a multigenerational organization of over 2,000 low-income South Asian immigrants, workers, and youth in New York City. We run membership-led campaigns seeking justice for issues that affect our communities, such as workers' rights, immigration and civil rights, including police accountability.

3. As Legal and Policy Director, I run our Racial and Immigrant Justice program which is focused on law enforcement accountability. I am responsible for recruiting and training low-income South Asians who have been unjustly targeted by any law enforcement agency to learn their rights; understand how their rights were violated; and become leaders in the South

Asian community. These individuals then lead campaigns to protect the communities' rights. I also train members to share their own personal experiences, as well as the experiences of their friends and community members when they lead community education presentations, participate in city-wide coalitions meetings, speak at public events or to the media, or testify in front of policy makers.

4. I have heard the accounts of members of DRUM, and their families, that have been stopped-and-frisked by the New York City Police Department ("NYPD").

5. Many of our campaigns focus on building alliances with other communities dealing with racial justice issues, including the use of stop-and-frisk by the NYPD. Over the last two years, on the issue of stop and frisk, members of DRUM testified in the New York City Council field hearings held in Queens, and during meetings with City Council members. Our members include a 14 year-old Bangladeshi girl who has been stopped-and-frisked twice on her way home from school, as well as young South Asian men who have been stopped and frisked dozens of times by the time they turn 21 years old. These members of DRUM have spoken at numerous public events about stop-and-frisk abuses and racial profiling for the past several years. Many members of DRUM came to several days of the *Floyd* trial. DRUM has issued and signed-on to statements to end racially discriminatory police stops in our communities.

6. DRUM is a supporting organization of Communities United for Police Reform (CPR), who is amici before the District Court in *Floyd*.

7. DRUM was founded in 2000 as a direct result of the community organizing in response to the NYPD's killing of Amadou Diallo, and as such has been fighting for an end to racial profiling and greater police accountability since that time.


8. Our communities, particularly the directly impacted youth and their families, embraced Judge Shira Scheindlin's August 12, 2013 decisions as vindication of what they have been experiencing for years. We see it as a beginning step in bringing about more just policing practices, not only in stop-and-frisk but also the broader issues of police misconduct, such as spying and racial and religious profiling that deeply affect our communities throughout the city.

9. DRUM has an important interest in the "Joint Remedial Process" ordered by the District Court. We believe that affected communities must be allowed a seat at the table to be part of the remedial processes around stop-and-frisk.

10. Any stay of the remedies ordered by the District Court would be extremely detrimental to our members. It sends a message that ending the NYPD's racial profiling can be put on hold, potentially, for years. Members already cynical about a police department that trumpets their surveillance of Muslims will lose any remaining hope for real change. As an organization that works with Communities United for Police Reform, and as an organization of South Asians who are directly impacted by the NYPD's stop-and-frisk policies, we are committed and already planning to participate in the Joint Remedial Process.

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: October 4, 2013

  
FAHD AHMED