

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
DEBORAH ALEXANDER, MAUD MARON, and  
NOAH HARLAN,

Plaintiffs,

-against-

TAJH SUTTON, President, Community Education  
Council 14, in her official and individual capacities;  
MARISSA MANZANARES, First Vice President,  
Community Education Council 14, in her official  
and individual capacities; DAVID C. BANKS,  
Chancellor, New York City Public Schools, in his  
official and individual capacities; NINA S.  
MICKENS, Equity Compliance Officer, in her  
official and individual capacities; COMMUNITY  
EDUCATION COUNCIL 14; NEW YORK CITY  
DEPARTMENT OF EDUCATION,

Case Number 1:24-cv-2224

:  
Defendants.

-----X

Defendants Tajh Sutton and Marissa Manzanares, by their counsel Jonathan  
Wallace, for their Answer, allege as follows.

1. Deny all of the assertions of paragraphs 14, 15, 16, 17, 18, 19, 22, 25, 26, 27,  
28-30, 78, 84, 88, 89, 93-95, 102-103, 105-106, 108-114.
2. Deny knowledge and information sufficient to form a belief as to the truth of  
paragraphs 32-42, 43-82, 116-119, 121-124, 126-127.
3. State that the following paragraphs call for a legal conclusion and are  
submitted to the consideration of this Court: paragraphs 85-87, 91-92, 97,  
98-99, 101.

WHEREFORE, Defendants demand dismissal of the Complaint in its  
entirety, together with such other and further relief as may be just and

proper, and the costs and disbursements of this action.

Amagansett, N.Y.  
May 20, 2024

/s/ Jonathan Wallace  
Jonathan Wallace  
PO #728  
Amagansett, NY 11930  
917-359-6234  
jonathan.wallace80@gmail.com  
Attorney for Defendants Manzanares  
and Sutton