

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF HERKIMER

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SOMANGSHU MUKHERJI,

Plaintiff,

Affidavit of Stephen Ames Berry

-against-

Index No. 2019-106335

STEPHEN AMES BERRY.

Defendant.

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The undersigned being duly sworn deposes and says:

1. My name is Stephen Ames Berry. I am over the age of (18) years of age, competent to make this affidavit, and not disqualified by law from doing so.
2. I reside at 330 Pleasant Avenue, Herkimer, New York. My wife is Linda J. Kaidan and my daughter is Alexandra Kaidan-Berry. I am the father-in-law of Somangshu Mukherji, aka Sam.
3. I am a Vietnam-era veteran of the US Army and a magna cum laude graduate of Boston University. I have a master's degree in management information systems and was a systems analyst and data architect at the Office of the Chief of Naval Personnel and Harvard University. I am a former officer of that university and a multi-times published author. (Berkley Publishing and St. Martins Press.) Just prior to our moving to Herkimer in 2014, I was a Special Needs Teacher for nine years in Sarasota, Florida, with certifications in five subject areas.
4. In 2004, while Alexandra and Somangshu, aka Sam, were living together in Somerville, MA, Sam asked us to post a surety bond for him with Federal immigration authorities, so that he could remain in the US while attempting to gain admission to a Ph.D program at another academic institution. Sam had been a doctoral candidate in psychology at Harvard. He said that Harvard was withdrawing its sponsorship of him because he had been falsely accused by of stealing equipment from a university lab facility. He needed our help to remain in the United States while applying for admission to doctoral programs at other universities. (He was ultimately accepted into Princeton's music theory doctorate program.)

5. We agreed to post the bond for him. We were very concerned that if he was deported, our daughter might follow him to India, where we were afraid that she would vanish.
6. It's been almost 20 years, but I keenly recall that we had to have \$40,000 available in our bank account for the federal government to put a one-year hold on as surety for Sam's good conduct. Which we did. Had Sam committed a crime during that time the time, he would have been deported to India and our \$40,000 confiscated.
7. In addition to the requirement of the bond, the other requirement of his remaining in the US was that Sam maintain full-time student status. At my wife Linda's suggestion, he enrolled in Bunker Hill Community to fulfill that requirement.
8. Before and after their marriage, Alex and Sam lived in Princeton, NJ, where was a teaching assistant at Princeton University. Between 2002 and the end of 2013, Alex visited us every summer in Florida. After we moved to Herkimer in 2014, she visited with us every summer except for the two years after her son Avram was born in 2016.
9. One day in 2004 when Alex and Sam lived in Princeton, Alex called and told her mother that she was pregnant by Sam. I was overheard the conversation. Sam had told Alex that she was to have an abortion, unless she could find someone else to raise their child. Linda told her that we'd be delighted to have a grandchild and would do what we could to help raise him or her, but that Sam and Alex would have to raise their own child. Shortly after that Alex called and said Sam had taken her for the abortion, and paid out of pocket for the procedure.
10. My wife Linda Kaidan and I engage in social activism and community betterment through our widely-viewed non-profit WordPress blog, the Herkimer Post (herkimerpost.com) and its associated YouTube channel. Mostly I write about crime; Linda's focus is primarily climate change.

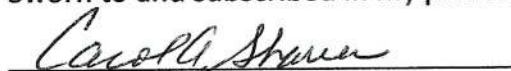
FURTHER AFFIANT SAYETH NAUGHT


Stephen Ames Berry

State of New York

County of Herkimer

Sworn to and subscribed in my presence this 30 day of September 2021



Notary Public

CAROL A. SHAVER
Notary Public, State of New York
No. 04SH6325057
Qualified in Herkimer County
My Commission Expires May 18, 2023