

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF HERKIMER

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SOMANGSHU MUKHERJI,

Plaintiff,

Affidavit of Linda J. Kaidan

-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 Linda J. Kaidan. 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 am the mother of Alexandra Kaidan-Berry. I have a master's degree in computer science from American University in Washington, DC. I worked as a software engineer for 21 years. I have been employed by the US Defense Mapping Agency, Jet Propulsion Laboratory, Oracle, IBM and the African Development Bank, where I was a US AID consultant.
3. In 2015 I helped create the blog The Herkimer Post. My focus on the blog is to raise awareness of climate change issues as well as the difficulties of living in Central New York, especially those related to drug abuse and other crime. I also continued my 52-year romance with photography by focusing on the Central NY region. As a Google Guide I now have 6 million views of my Google Maps photographs and reviews.
4. I first met Somangshu Mukherji, aka Sam, in 2003 when he came with our daughter Alexandra to visit with us at our home in Sarasota, Florida. Though generally friendly, he expressed contempt for the cleanliness of our bathroom because of the hardwater stains in the faucet area. He therefore refused to use the bathroom shower.
5. In 2004 Sam asked my husband if we would help him stay in the US after being removed from his PhD Psychology program at Harvard University. He claimed he was falsely accused of stealing property from his research laboratory. He asked my husband, Stephen Ames Berry, and I to post a surety bond of \$40,000 to ensure that he could stay in the country for the next academic year, which we did. During the term of this 1-year

bond, a hold for \$40,000 was placed on our bank account for that amount. Had Sam committed any crime whatsoever during that period, we would have forfeited the entirety of this sum. At my suggestion, he attended Bunker Hill Community College in Boston, MA for 1 year to fulfill the requirement that he maintain his student status. He was admitted to Princeton University for the following year for a PhD in Music.

6. Late in 2006, while attending Pratt Institute of Art, Alexandra had a psychotic episode. My daughter Shelly and I came from Florida to visit her and stayed for a couple of days at Sam's apartment in Princeton, NJ. Upon arrival, Sam instructed Shelly, (then age 15) and I to clean his apartment, including the clogged tub. We were very tired, but invested about 3 hours in this endeavor. Later when we visited with Alexandra at New York's Presbyterian Hospital, Sam immediately started an argument with Shelly, calling her a poser. I was horrified.
7. In 2005, while Sam and Alex lived in Princeton, Alex called me to say that she was pregnant by Sam and that he had ordered her to have an abortion, unless she could find someone else to raise their child. She asked me if I would raise their child. I said no, though we would be delighted have a grandchild and would help out. Sam then took Alex to have an abortion, which she did.
8. While Alexandra and Sam lived in Princeton, Sam invited me to visit twice, and I did. But as the years progressed, he became increasingly isolated and controlling. He absolutely controlled Alexandra's ability to use her cellphone, which we initially paid for, and discouraged her from having friends. He did not encourage Alexandra's interest in the arts. When we sent her a printer, paper, and video camera to pursue her artistic endeavors, he confiscated them from her.
9. Despite Sam's forbidding it, I visited with Alex a few times in Ann Arbor. I visited when he was away from Ann Arbor for academic conferences. Alex and I would coordinate my visits via cellphone on WhatsApp, a messaging service Sam couldn't monitor. Alex would create a new account for each call, then delete it when we were through talking, so that Sam wouldn't find WhatsApp during his frequent inspection of her cellphone. Sam would sometimes let her use their computer, but it wasn't secure—he always seemed to know her social media passwords as soon as she changed them.
10. In his various testimonies, Sam never gives Alexandra credit for being the loving mother or a talented artist which she is. He denies the veracity of her every statement and indeed her very right to see her own child, as allowed by the order of the Family Court in Ann Arbor Michigan. He vowed in writing, in a vile and obscene email to Alexandra, that "you will never see your son again." (Alexandra reported that email to the Herkimer police and was granted an order of protection.)
11. Alexandra has never committed any crime except for a New Jersey Transit misdemeanor 15 years ago. She has never been found guilty of child abuse, though

Herkimer Child Protection Services investigator Sara Riente, sent at Sam's instigation, did accuse her of neglect by reason of a sagging diaper. As an ardent photographer, I fortuitously took photos of Avram, just minutes before Riente's surprise visit to our home. They are date time and location coded. They attest to the general happiness and cleanliness of Avram.

12. I attest to the fact that Alex only "ran away" one time, many years prior to being a mother. She was homeless and was not able to find a place in a shelter. The period of her absence was 6 weeks, not several months. This happened while she was in Ann Arbor. She did not run away from me or my husband. She ran away from Sam, who when I came to Ann Arbor to help look for Alex, who not only wouldn't help look for her, but passed her homelessness off to me as some kind of humorous lark.
13. In 2017, Alexandra met an older local man on Craigslist, Craig. At his invitation, she visited him and his family with Avram. Craig called me twice while Alex was there to assure me that she and Avram were fine. I also spoke with Alex, who confirmed this and said that Sam had sent the police looking for her. The police did a wellness check, were satisfied and left. As Sam controlled and dispensed her psychotropic medications, she'd left without them. Fortunately there was a refill available, which Craig paid for. After a few days with Craig, his daughter and grandson, Alex and Avram returned to Sam's.
14. Sam has expressed unearned contempt for our entire family, calling me a vagabond, trailer trash, smelly, schizophrenic and a "cunt". He has repeatedly called my husband Stephen a pedophile. He reported my husband to CPS and the Herkimer Police as a pedophile and myself to CPS as a dangerous schizophrenic. He has falsely accused our entire family of child endangerment and informs the world that Alex is totally insane and valueless and any testimony she gives is worthless due to her mental illness.
15. While attesting to his own impeccable virtues, Sam neglects to inform others that he has dumped his son on my estranged sister in Providence Rhode Island numerous times, because he himself required peace and quiet. This happened on each occasion against Alexandra's will. When our grandson Avram was born, following a very difficult pregnancy, Sam took him, without Alex's permission, to my sister's in Providence and left him there for nearly six months. Sam would not let me visit my daughter during her pregnancy or after the birth of our grandson.
16. Alex has been living in our home since January 2019 when she fled here with Avram via Uber from my sister's home in Providence. I immediately worked with her to obtain health insurance for both her and Avram. Because Sam refused to help by providing the vital documentation for Alex and her son, I had to reproduce all their documentation from various sources. It took time and was expensive. Alexandra has had health coverage and been compliant with her treatment plan for the last for two and a half years. She had to change psychiatric providers this year after St. Joseph's Hospital in

Syracuse failed to call her for an on-line counselling session and promptly deregistered her, despite numerous phone calls from Alexandra. She is now seeing a local psychiatric provider.

17. In August of 2020, Sam invited Alex to visit Avram and himself in Ann Arbor. Desperate to see her son, she agreed, though with great anxiety and several abortive attempts to start her trip. Given Sam's history of abuse, she was filled with anxiety. I encouraged her to go, if only to see if Avram was well. In September she finally went. She was able to call me once from Sam's—he'd forbidden her to call me. She told me Avram wasn't there, that Sam said he'd taken him to my sister's in Providence RI, and would only return him when he was satisfied that Alexandra wasn't a threat to Avram's safety.
18. Alex next called me on 9/14/20 from the Ann Arbor Amtrak station. She said Sam told her that he was going to bring Avram home from my sister's several times, but had not done so. Sam had grown increasingly hostile and ever more micromanaging, she said. Giving up hope of seeing Avram, Alex left without telling Sam. I sent her an Amtrak ticket to Utica, where I said I would pick her up.
19. At 12:15 am on 9/15/20, Alex called me from the Toledo Ohio Amtrak Station. She told me that Sam had followed her from Ann Arbor to Toledo, OH via taxi. She described this as a harrowing experience involving Sam and the Toledo police. She fled to the Women's rest room. Sam entered the Women's rest room in pursuit and was still there. I then heard Sam's voice, angrily telling Alexandra that if we attempted to visit Avram at my sister's in Rhode Island, he would have us arrested for "contempt of court" and "potential kidnapping." Shortly afterwards, Alexandra reported that Sam had apparently left the train station.
20. Alexandra became increasingly depressed after returning to our home from Ann Arbor and was hospitalized again at St. Joseph's in Syracuse during Christmas of 2020.
21. Photographs on our blog ([herkimerpost.com](http://herkimerpost.com)) attest to Alexandra's appearance before and after Sam. Photos on the blog also show Avram when he briefly lived with us in Herkimer and how he looks now that he lives with Sam. With us he looked happy and well-nourished and well-dressed. Not so at Sam's.

**FURTHER AFFIANT SAYETH NAUGHT**



Linda J. Kaidan

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, ~~2022~~