

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF WESTCHESTER**

X-----X

ALLAN KASSENOFF,

Plaintiff,

-against-

CATHERINE KASSENOFF,

Defendant.

X-----X

Index No.: 58217/2019

**AFFIDAVIT OF  
GAETANE MICHAUD**

STATE OF NEW YORK            )  
  ) ss:  
COUNTY OF WESTCHESTER    )

GAETANE MICHAUD, being duly sworn, deposes and says:

1. I am the mother of two 7-year old girls who have been friends with Ms. Kassenoff's children for several years. My girls go to the same school as Charlotte Kassenoff, the French American School of New York. Through a mutual friend, Ms. Kassenoff's children and mine have become close friends, particularly since this divorce action began. They have spent time together on play dates, sleepovers, and attending each other's performances and other significant events. And importantly, they have been supporting each other through their unique life experiences — including having mothers who have battled breast cancer and parents who are divorcing. Indeed, these girls have developed a special bond, at a very young age.

2. Last week, Alexandra was given a book by her school regarding separation and divorce, to help her cope with what she was experiencing. She brought the book to my home and wanted to share it with my daughters because they have gone through a similar situation. There were questions embedded throughout the book, which prompted the children to talk about their feelings. The girls and I read the book together.

3. When we reached the section of the book, which asked, “what makes you afraid?” Josephina answered that she becomes afraid when her dad gets angry and yells. She also said that when she is afraid, her dad doesn’t let her talk to her mom or her therapist. She continued that her father hides or takes away the phone from her or lets the phone battery run out.

4. Upon hearing their sister’s concerns, Ms. Kassenoff’s two other daughters, Alexandra and Charlotte, stated that they too are afraid when their dad becomes angry and yells and they confirmed Josephina’s description of their father hiding the phone. They also stated that sometimes when they speak to their mother during their father’s access, he takes the phone from them and hangs up on Ms. Kassenoff, even if they haven’t all had a chance to speak to her or are in the middle of a conversation. Finally, they shared that their father has told them that they shouldn’t be speaking to their mother on “his day.”

5. My daughters immediately tried to comfort the girls and told them that they are always allowed to speak to their mom or dad, and that their father not letting them speak to their mom or therapist is not right.

6. I was also concerned by another incident. On November 17, 2019, Alexandra came to my house after Charlotte’s and Josephina’s violin recital, which we all attended. We would then all go to Charlotte’s last soccer match of the year where we could support her alongside her family. Since it was cold outside, Alexandra put on fleece pajamas over the clothes she was already wearing to stay warm, which she said her father purchased for her. Before the game, I took Alexandra, Elise and Chloe for Italian food, and Alexandra accidentally spilled red sauce on her pajamas. She became very upset and nearly started to cry, even after we wiped it away. I asked her why she was so upset, and she told me that her dad was going to be very angry with her. I told her that we could go to my house and put them in the washing machine before the game, but she did not calm down

until after I suggested that her mom could wash them before her dad got back the next day. Then, as we left the soccer game, I noticed there was a hole Alexandra's same fleece pajama pants. Again, she became very upset and said that her dad was going to yell at her. Again, Alexandra could not calm down until Ms. Kassenoff assured her that she could fix it.

  
GAËTANE MICHAUD

Sworn to before me this  
4<sup>th</sup> day of December 2019

  
Notary Public

**LAURIE A. REMPP**  
Notary Public, State of New York  
No. 02RE6254726  
Qualified in New York County  
Commission Expires January 23, 2020