

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

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ALLAN KASSENOFF,

Plaintiff,

Index No. 58217/19

-against-

AFFIDAVIT

CATHERINE KASSENOFF,

Defendant.

-----X
STATE OF NEW YORK)
) ss
COUNTY OF NEW YORK)

I, ZION HILELLY, being duly sworn, deposes and says:

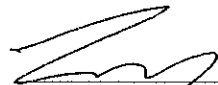
1. I am currently a Managing Director at BlackRock, global investment manager, in New York City, where I have worked for the last 26 years.
2. I have known the Kassenoff family for approximately six years, when my daughter Anya and Charlotte Kassenoff were in the same classes at LinguaKids in Larchmont, New York and at the French American School of New York ("FASNY"). Anya and Charlotte have been best friends since they met.
3. Over the years, I have gone to dinner with the Kassenoffs, been to their house, had them as guests at my house and spent time with them at basketball and soccer games for our children, as well as FASNY events, among other things.

4. Over the Martin Luther King weekend, in late January 2019, my daughter Anya was a guest at the Kassenoff household in Larchmont. She had been invited to sleep over with Charlotte on the evening of Saturday, January 19th.

5. At approximately 8 p.m. that evening, I received a call from Allan Kassenoff ("Allan") that he was bringing Anya back home and that she would not be staying the night with Charlotte.

6. Shortly thereafter, Allan arrived at my house with both Anya and Charlotte.

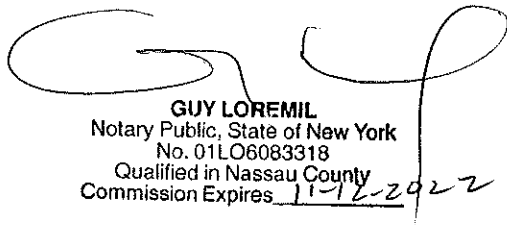
7. Later, when Allan Kassenoff left my house, I asked Anya what had happened. Anya explained that Allan had been yelling at Alexandra -- his oldest daughter, that Alexandra had been crying, and that the yelling scared her, so she wanted to return home immediately. This was one of Anya's first sleep overs at a friend's house.



ZION HILELLY

Sworn to before me

this 25 day of September 2019



GUY LOREMIL
Notary Public, State of New York
No. 01LO6083318
Qualified in Nassau County
Commission Expires 11-12-2022