

EXHIBIT B

SUPREME COURT OF THE STATE OF NEW YORK
KINGS COUNTY

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A.B. and C.D. by their parent and next friend,
JANE ROE, *et al.*

Plaintiffs,

vs.

KATHY HOCHUL, as Governor of the State of
New York, *et al.*

Defendants,

YESHIVA MOSDOS CHASIDEI SQUARE BORO
PARK, YESHIVA MOSDOS CHASIDEI SQUARE
OF WILLIAMSBURG, YESHIVA TORAH V'YIRAH
BAIS ROCHEL, YECHIEL EINHORN, CHAIM
MEIR ISRAEL, ABRAHAM SEKULA, YAKOV
SILBERMAN, JACOB KALISCH, YOSEF KLEIN,
ANN KOENIG, MOSHE WEISS, JOSEF WEBER
MOSHE FRIEDMAN, ELIAZER WERZBERGER,
YITZCHOK UNGER, and AVROHOM FRIESEL,

Intervenor-Defendants.

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COMES NOW SBarshovLaw PLLC, as counsel to the Intervenor-Defendants and states as follows for their Answer to the Complaint filed by the Anonymous Plaintiffs:

1. Paragraphs 1 through 4 set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.
2. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 5 and therefore deny same.
3. Intervenor Defendants deny the allegations in Paragraphs 6.
4. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 7 and therefore deny same.

5. Intervenor Defendants deny the allegations in Paragraphs 8.

6. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 9 and therefore deny same.

7. Paragraph 10 sets forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

8. Intervenor Defendants deny the allegations in Paragraphs 11 through 12.

9. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraphs 13 through 19 and therefore deny same.

10. Intervenor Defendants admit the allegations in Paragraphs 20 and 21 that the Defendants are sued in their official capacity. The remaining allegations set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

11. Paragraph 22 sets forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

12. Intervenor Defendants deny the allegations in Paragraphs 23 through 24.

13. Paragraphs 25 through 30 set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied

14. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraphs 31 through 35 and therefore deny same.

15. Intervenor Defendants deny the relevance to this litigation of the matters pled in Paragraph 36, including the inaccurate generalized stereotypes set forth therein which are exaggerated and in multiple instances, false, including but not limited to the reasons why Yeshiva parents enroll their children in Yeshivas. Therefore, the allegations in Paragraph 36 are denied.

16. Intervenor Defendants deny the allegations in Paragraphs 37 through 38.
17. Intervenor Defendants deny the allegations in Paragraph 39.
18. Intervenor Defendants deny the allegations in Paragraphs 40 through 45.
19. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraphs 46 through 49 and therefore deny same.
20. To the extent that reference is made in Paragraph 50 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.
21. Paragraph 51 sets forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.
22. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 52.
23. To the extent that reference is made in Paragraphs 53 through 55 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.
24. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 56 and therefore deny same.
25. To the extent that reference is made in Paragraph 57 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.
26. Paragraph 58 sets forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.
27. To the extent that reference is made in Paragraphs 59 through 61 to a document not

appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

28. Paragraphs 62 through 64 set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

29. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraphs 65 through 70 and therefore deny same.

30. To the extent that reference is made in Paragraphs 71 through 74 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

31. Intervenor Defendants admit that the New York State Legislature adopted an amendment to New York State Education Law § 3204 known as the “Felder Amendment” and deny sufficient knowledge to form a belief as to the truth of the remaining allegations in Paragraph 75.

32. To the extent that reference is made in Paragraph 76 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

33. Paragraphs 77 and 78 are missing from the Complaint and therefore no response is possible.

34. Paragraphs 79 through 85 set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

35. Intervenor Defendants deny the allegations in Paragraphs 86.

36. Paragraphs 87 through 88 set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

37. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 89 and therefore deny same.

38. To the extent that reference is made in Paragraphs 90 through 91 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

39. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 92 and therefore deny same.

40. To the extent that reference is made in Paragraphs 93 through 96 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

41. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraphs 97 through 98 and therefore deny same.

42. Intervenor Defendants deny the allegations in Paragraph 99.

43. To the extent that reference is made in Paragraph 100 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

44. Intervenor Defendants deny the allegations in Paragraph 101.

45. To the extent that reference is made in Paragraphs 102 through 103 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

46. Intervenor Defendants deny the allegations in Paragraph 104.

47. To the extent that reference is made in Paragraph 105 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity,

and the remainder of the allegations set forth therein are denied.

48. asdf Intervenor Defendants deny the allegations in Paragraph 106.

49. To the extent that reference is made in Paragraph 107 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

50. Intervenor Defendants deny the allegations in Paragraph 108.

51. To the extent that reference is made in Paragraph 109 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

52. Regarding Paragraph 110, Intervenor Defendants admit that *Yeshiva Mosdos Chasidei Square Boro Park v. New York State Education Department*, Index No. 906775-25 was commenced in Supreme Court Albany County and refers the Court to the pleadings filed therein. The remainder of Paragraph 110 set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

53. Intervenor Defendants lack sufficient knowledge to form a belief as to the truth of the allegations in Paragraphs 111 through 113 and therefore deny same.

54. Intervenor Defendants deny the allegations in Paragraph 114.

55. Paragraphs 115 through 119 set forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

56. Intervenor Defendants deny the allegations in Paragraph 120.

57. Paragraph 121 sets forth conclusions of law to which no response is required and to the extent any response is required, the allegations set forth therein are denied.

58. Intervenor Defendants deny the allegations in Paragraphs 122 through 126.

59. To the extent that reference is made in Paragraph 127 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

60. Intervenor Defendants deny the allegations in Paragraphs 128 through 138.

61. To the extent that reference is made in Paragraphs 139 through 140 to a document not appended to the Complaint, Intervenor Defendants refer the Court to that document for its truth or falsity, and the remainder of the allegations set forth therein are denied.

62. Intervenor Defendants deny the allegations in Paragraphs 141 through 148.

63. Regarding Paragraphs 149 through 155, Intervenor Defendants deny that the Anonymous Plaintiffs represent the interests of the students attending nonpublic ultra-Orthodox Yeshivas or students who were graduated from such Yeshivas, and to the extent any additional response is required, deny the remaining allegations therein.

64. Regarding Paragraph 156, Intervenor Defendants repeat the responses to Paragraphs 1 through 155.

65. Intervenor Defendants deny the allegations in Paragraph 157.

66. Regarding Paragraph 158, Intervenor Defendants repeat the responses to Paragraphs 1 through 157.

67. Intervenor Defendants deny the allegations in Paragraph 159.

68. Regarding Paragraph 160, Intervenor Defendants repeat the responses to Paragraphs 1 through 159.

69. Intervenor Defendants deny the allegations in Paragraph 161.

70. Regarding Paragraph 162, Intervenor Defendants repeat the responses to Paragraphs 1 through 161.

71. Intervenor Defendants deny the allegations in Paragraph 163.

72. Regarding Paragraph 164, Intervenor Defendants repeat the responses to Paragraphs 1 through 163.

73. Intervenor Defendants deny the allegations in Paragraph 165.

74. Regarding Paragraph 166, Intervenor Defendants repeat the responses to Paragraphs 1 through 165.

75. Intervenor Defendants deny the allegations in Paragraph 167.

76. Intervenor Defendants deny that the Anonymous Plaintiffs are entitled to any relief.

77. To the extent any allegation in the Complaint has not been responded to hereinabove, it is denied.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

78. The Complaint fails to state a claim upon which relief can be granted.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

79. The Plaintiffs lack standing to sue.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

80. Plaintiffs' claims are barred by laches.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

81. Plaintiffs' claims are barred by the statute of limitations.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

82. Plaintiffs' claims are barred by *res judicata*.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

83. Plaintiffs' claims are barred by collateral estoppel.

Dated: Haverstraw, New York
_____, 2026

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