CAUTION: THIS DOCUMENT HAS NOT YET BEEN REVIEWED BY THE COUNTY CLERK. (See below.) INDEX NO. UNASSIGNED

NYSCEF DOC. NO. 12 RECEIVED NYSCEF: 10/01/2021

Exhibit 8

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

CAUTION: THIS DOCUMENT HAS NOT YET BEEN REVIEWED BY THE COUNTY CLERK. (See below.) INDEX NO. UNASSIGNED

NYSCEF DOC. NO. 12 RECEIVED NYSCEF: 10/01/2021

Brumfield, Meredith

From: Lovin, Samantha

Sent: Friday, February 19, 2021 12:44 PM

To: CVTodd@PDCN.ORG

Cc: Miller, Atara; Taylor, Errol; Wellin, Andrew; Prussien, Kingdar; Pere, Lyndsey

Subject: RE: FOIL Request Correspondence Reference # LB 649-20

Mr. Todd,

We are following up on the below to inquire when we can expect a response to our more particularized FOIL requests.

On a related note, we understand from the Article 78 petition that Newsday recently filed regarding its FOIL request directed to the Nassau County Police Department's ("NCPD"), that the NCPD took the position that Public Officers Law Section 87(2)(b) permits it to withhold (or redact) unsubstantiated and unfounded civilian complaints against police officers. Based on NCPD's response to our FOIL requests and our prior discussions, we had understood that unsubstantiated or unfounded civilian complaints will be produced in response to our request for all disciplinary records. Please let us know by no later than Tuesday, February 23, whether NCPD intends to object to producing documents or information related to unfounded and/or unsubstantiated complaints.

Thank you, Samantha

Samantha Lovin | Milbank | Associate 55 Hudson Yards | New York, NY 10001-2163 T: +1 212.530.5433 slovin@milbank.com | milbank.com

From: Lovin, Samantha

Sent: Wednesday, February 10, 2021 11:18 AM **To:** 'CVTodd@PDCN.ORG' < CVTodd@PDCN.ORG>

Cc: Miller, Atara <AMiller@milbank.com>; Taylor, Errol <ETaylor@milbank.com>; Wellin, Andrew

<awellin@milbank.com>; Prussien, Kingdar <KPrussien@milbank.com>; Pere, Lyndsey <lpere@milbank.com>

Subject: FOIL Request Correspondence Reference # LB 649-20

Mr. Todd,

Please see the attached correspondence.

Regards, Samantha

Samantha Lovin | Milbank | Associate 55 Hudson Yards | New York, NY 10001-2163 T: +1 212.530.5433 slovin@milbank.com | milbank.com

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