

# **EXHIBIT 8**

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**From:** Darius Charney <dcharney@ccrjustice.org>  
**Sent:** Friday, May 22, 2020 11:42 AM  
**To:** Sundaran, Raju (Law); SCHLANGER, JEFFREY; Cooper, David (Law)  
**Cc:** Jonathan C. Moore; Richard Jerome; Savasta, Nancy (Law); Nelson, Genevieve (Law); Dominique Day; Lupe Aguirre; Katherine "Q" Adams; Marc Arena; Ian Head; Omar Farah; Stoughton, Corey; Lee, Jin Hee; Audain, Raymond; Borchetta, Jenn Rolnick; Grace Li; Zimroth, Peter L.  
**Subject:** Re: Current Police Behavior

Raju, Jeff, David-

Given Floyd Plaintiffs' ongoing concerns that the NYPD's recent social distancing enforcement efforts run afoul of the requirements of the Court's prior orders in Floyd, which we have raised with the City and Monitor several times over email and in All-Parties Zoom meetings over the past month, I am writing to notify you that Floyd Plaintiffs intend to move the Court by order to show cause early next week for an emergency order that:

- Finds the NYPD's social distancing enforcement practices to be in violation of the Court's prior orders
- Directs the Monitor to conduct an expedited investigation and evaluation of the NYPD's social distancing enforcement practices and report his findings to the parties, the Court, and the public
- Enjoins the NYPD from conducting any further social distancing enforcement pending the completion of the Monitor's investigation and a determination by the Court of whether and how the NYPD can conduct social distancing enforcement in a manner consistent with the Court's prior orders; and
- Directs the City to produce all of the social distancing enforcement-related discovery requested by Floyd Plaintiffs on April 22.

Pursuant to Judge Torres' Individual Rules, Floyd Plaintiffs ask that you let us know by close of business this afternoon whether you consent to the order Plaintiffs will seek from the Court.

Darius (on behalf of the Floyd Team)

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**Darius Charney**  
Senior Staff Attorney  
*Pronouns: He/Him*

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666 Broadway, 7th Floor New York, NY 10012  
212.614.6475

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