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April 30, 2021

Via ECF and Federal Express

Hon. William F. Kuntz, II  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Liotti v. Nassau County Board of Elections, et al.*  
*CV-19-4264 (WFK)(LB)***

Dear Judge Kuntz:

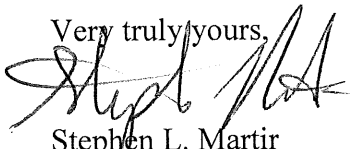
This office represents the Nassau County Republican Committee and the Nassau County Conservative Party, two of the defendants in the above-referenced matter. Pursuant to the briefing schedule (DE 48), said Defendants' fully briefed Motion to Dismiss has been filed electronically on this date. A Courtesy Copy of the motion papers is being sent to the Court in conformity with Section III.G.1 of this Court's Individual Motion Practices and Rules. The filing consists of the following documents:

1. Notice of Motion; **(DE 74)**
2. Declaration of Stephen L. Martir in Support of Defendants' Motion to Dismiss **(DE 76)**
  - a) Exhibit A – Plaintiff's Verified Complaint; **(DE 76-1)**
  - b) Exhibit B – Plaintiff's Verified Amended Complaint; **(DE 76-2)**
  - c) Exhibit C – Photographs of Election Machine **(DE 76-3)**;
3. Memorandum of Law in Support; **(DE 77)**
4. Certificate of Service of Defendants' Motion Papers: **(DE 78)**
  - a) Cover letter accompanying initial motion documents; **(DE 78-1)**
5. Composite Declaration of Thomas F. Liotti in Opposition to the Defendants' Motions to Dismiss the Verified Complaint; **(DE 79)**;
  - a) Exhibit A – Synopsis of Thomas Liotti's Resume; **(DE 79-1)**
  - b) Exhibit B – 3/2/1978 Article from *The Westbury Times*; **(DE 79-2)**
  - c) Exhibit C – Article from *Criminal Justice Journal*, Winter 1997 Edition; **(DE 79-3)**

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6. Composite Memorandum of Plaintiffs in Opposition to Defendants' Motions to Dismiss; **(DE 80)**
  - d) Exhibit D – Undated Article titled “Supreme Court Test for Crucial Provision of Voting Rights Act”; **(DE 80-1)**
  - e) Exhibit E – 3/4/2021 Article from *The New York Law Journal*; **(DE 80-2)**
  - f) Exhibit F – 2/9/2021 Editorial from *The New York Times*; **(DE 80-3)**
  - g) Exhibit G – 2/16/2021 Article from *The New York Times*; **(DE 80-4)**
  - h) Exhibit H – Article in *Verdict* by Thomas Liotti; **(DE 80-5)**
  - i) Exhibit I – 2/25/21 Article from *Newsday* titled “Spota Judge to Unseal Burke-related Records”; **(DE 80-6)**
  - j) Exhibit J – 2/25/21 Article from *Newsday* titled “Board Rejects Proposal to Limit Political Activity of Judges”; **(DE 80-7)**
  - k) Exhibit K – 2/25/21 Editorial from *Newsday*; **(DE 80-8)**
  - l) Exhibit L – Copy of Amended Verified Complaint, CV-19-4264; **(DE 80-9)**
7. Memorandum of Law in Reply to Plaintiff's Opposition and In Further Support of Defendants' Motion to Dismiss. **(DE 81)**

Thank you for your attention to this matter.

Very truly yours,  
  
Stephen L. Martir

SLM:mgf

cc: Hon. Lois Bloom (without enclosures)  
Counsel of Record (via ECF)