



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAUNA NOEL, et al

Plaintiffs,

-against-

CITY OF NEW YORK,

Defendant.
-----X

KATHARINE H. PARKER, UNITED STATES MAGISTRATE JUDGE:

Plaintiffs commenced this action to challenge a New York City policy regarding affordable housing lotteries. The City’s policy allocates 50% of units in affordable housing lotteries to individuals who already reside in the community district where the new affordable housing units are located. This policy is referred to herein as the “Community Preference Policy.” Plaintiffs allege that the Community Preference Policy violates the federal Fair Housing Act (“FHA”), 42 U.S.C. § 3604 *et seq.*, and the New York City Human Rights Law (“NYCHRL”), NYC Admin. Code § 8-107, *et seq.*, because it perpetuates racial segregation and disparately impacts racial minorities. They also claim that the City’s decision to establish, expand, and maintain the policy constitutes intentional discrimination.

Currently pending before this Court is Plaintiffs’ motion challenging privilege designations on 500 documents in the City’s privilege log. The City asserts that the documents are protected from disclosure based on one or more of the following reasons: (1) attorney-client privilege, (2) work product protection, (3) deliberative process privilege, and (4)

legislative privilege. This Court assumes the reader's familiarity with the factual background of this case based on its many decisions in this action and does not repeat it here. *See Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 5664852, at *1-6 (S.D.N.Y. Nov. 27, 2017); *Winfield v. City of New York*, No. 15-cv-5236 (LTS) (DCF), 2016 WL 6208564, at *1-3 (S.D.N.Y. Oct. 24, 2016); *see also Winfield v. City of New York*, No. 15-cv-5236 (LTS) (KHP), 2017 WL 2880556, at *1-2 (S.D.N.Y. July 5, 2017), objections overruled by, 2017 WL 5054727, at *1-2 (S.D.N.Y. Nov. 2, 2017).

The City submitted for *in camera* review a detailed privilege log with hyperlinks to all 500 documents and, in some cases, cover emails for the documents. The City also submitted a series of letters at this Court's request providing greater detail as to the basis for the assertion of privilege as to certain documents and categories of documents. In addition, after questions by the Court as to certain documents, the City withdrew its privilege designations and elected to produce these documents.¹

In addition, the Court is in receipt of the ruling of the Honorable Laura Taylor Swain dated December 12, 2018 setting aside this Court's February 2018 Order insofar as it addressed claims of deliberative process privilege. *See* ECF Nos. 259, 655. This Court has, consistent with Judge Swain's ruling, evaluated the City's claims of deliberative process privilege and whether disclosure is warranted under the factors set forth in *Rodriguez v. Pataki*, 280 F. Supp.2d 89, 99-

¹ The documents the City has decided to produce are identified on the privilege log in column A as numbers: 1, 5, 13, 14, 24, 65, 66, 72, 74, 75, 95, 106, 107, 108, 119, 124, 125, 130, 147, 233, 255, 303, 307, 328, 333, 341, 345, 353, 354, 360, 362, 372, 373, 374, 376, 378, 380, 382, and 499. Certain of these documents will be produced in redacted format.

101 (S.D.N.Y. 2003), in the manner prescribed by Judge Swain. This Court has adopted the same methodology for evaluating whether documents subject to the legislative privilege should nevertheless be produced pursuant to the *Rodriguez* balancing factors. Because this Court has previously set forth the standards governing applicability of the attorney-client privilege and work product privilege, it does not repeat them in detail here and refers the parties to the Court's prior decision. See ECF No. 259.

The Court has carefully reviewed all of the submissions by the parties and all 500 documents. In the interest of brevity and expediency, the Court does not discuss its reasoning as to each of the 500 documents here. Instead, the Court discusses treatment of certain categories of documents and provides an annotated spreadsheet providing additional information about each document and its rulings as to each.

Discussion

I. Attorney-Client Privilege

The attorney-client privilege “exists for the purpose of encouraging full and truthful communications between an attorney and his client and ‘recognizes that sound legal advice or advocacy serves public ends and that such advice or advocacy depends upon the lawyer’s being fully informed by the client.’” *In re Von Bulow*, 828 F.2d 94, 100 (2d Cir. 1987) (quoting *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981)). The party seeking to invoke the privilege bears the burden of establishing its applicability. *In re Cty. of Erie*, 473 F.3d 413, 418 (2d Cir. 2007). To do this, the governmental party claiming attorney-client privilege must establish: (1) a communication between government counsel and their clients, (2) that was intended to be and

was in fact kept confidential, and (3) was made for the purpose of obtaining or providing legal advice. *See id.* at 419 (internal citation omitted). As to factor 3, the key inquiry is whether the “predominant purpose” of the communication is to solicit or provide legal advice. *Id.* at 419-20 (collecting cases). When legal advice is the predominant purpose, “other ‘considerations and caveats’ are not severable and the entire communication is privileged.” *Fox News Network, LLC v. US Dep’t of Treasury*, 739 F. Supp. 2d 515, 560 (citing *In re Cty. of Erie*, 473 F.3d at 420). On the other hand, if the legal advice is merely “incidental to the nonlegal advice that is the predominant purpose of the communication,” then the legal portions of the document may be redacted. *In re Cty. of Erie*, 473 F.3d at 420 n.8.

With these standards in mind, the following documents on the City’s privilege log are protected by the attorney-client privilege: 3, 4, 18, 19, 22, 23, 25, 26², 27, 38, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 42, 44, 51, 53, 59, 60, 69, 70, 71, 80, 92, 93, 94, 96, 97, 98, 100, 109, 110, 113, 114, 120, 122, 123, 126, 136, 139, 140, 142, 159, 163, 175, 178, 190, 193, 194, 216, 218, 232, 235, 238, 239, 240, 241, 242, 245, 248, 250, 251, 256, 266, 274, 275, 287, 288, 295, 298, 300, 306, 346, 349, 357, 359, 361, 363, 364, 470, 472, 476, 478, 480, 485. All of these documents involve communications and draft documents exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice. Because the attorney-client privilege applies, the Court does not need to reach any other privilege asserted. The following documents are not protected by the attorney-client privilege

² A substantial portion of the communications in this document are not privileged. The City shall produce a redacted version of this document redacting the limited portions that relate to topics on which legal advice is sought or given.

but, if subject to another privilege, are identified in the appropriate section below: 0, 4, 13, 43, 46, 95, 128, 130, 141, 165, 166, 176, 186, 233, 253, 254, 255, 260, 261, 263, 264, 265, 273, 279, 282, 284, 289, 291, 292, 293, 321, 342, 353, 360, 477, 499. These documents do not reflect communications or drafts exchanged between attorneys for the City and their clients for the predominant purpose of seeking or conveying legal advice.

II. Work Product

The work product doctrine protects a broader category of documents and communications than the attorney-client privilege. Specifically, it protects documents and other tangible things “that are prepared in anticipation of litigation or for trial by or for a party or its representative.” Fed. R. Civ. P. 26(b)(3)(A); *see also Bowne of N.Y.C., Inc. v. AmBase Corp.*, 150 F.R.D. 465, 471 (S.D.N.Y. 1993). Documents “should be deemed prepared ‘in anticipation of litigation’ . . . if, ‘in light of the nature of the document and the factual situation in the particular case, the document can fairly be said to have been prepared or obtained *because of* the prospect of litigation.’” *United States v. Adlman*, 134 F.3d 1194, 1202 (2d Cir. 1998) (emphasis in original) (internal citation omitted). “Where a document was created because of anticipated litigation, and would not have been prepared in substantially similar form but for the prospect of that litigation,” it is protected as work product. *Id.* at 1195. “Conversely, protection will be withheld from ‘documents that are prepared in the ordinary course of business or that would have been created in essentially similar form irrespective of litigation.’” *Schaeffler v. United States*, 806 F.3d 34, 43 (2d Cir. 2015) (quoting *Adlman*, 134 F.3d at 1202).

Work product protection, however, is not absolute. A party seeking discovery may overcome work product protection and obtain disclosure of material otherwise discoverable under Fed. R. Civ. P. 26(b)(1) by showing (1) substantial need for the material; and (2) an inability to obtain its substantial equivalent from another source without undue hardship. Fed. R. Civ. P. 26(b)(3)(A); *Obeid v. Mack*, No. 14-cv-6498 (LTS) (HBP), 2016 WL 7176653, at *5 (S.D.N.Y. Dec. 9, 2016). Although factual materials “may generally be discovered upon a showing of substantial need,” *Obeid*, 2016 WL 7176653, at *5 (internal quotation marks and citations omitted), courts “must protect against disclosure of the mental impressions, conclusions, opinions, or legal theories of a party’s attorney or other representative concerning the litigation.” Fed. R. Civ. P. 26(b)(3)(B) (emphasis added). “Documents or portions of documents that qualify as ‘opinion work product’ are ‘entitled to virtually absolute protection.’” *United States v. Mount Sinai Hosp.*, 185 F. Supp. 3d 383, 390 (S.D.N.Y. 2016) (quoting *United States v. Ghavami*, 882 F. Supp. 2d 532, 540 (S.D.N.Y. 2012)).

With these standards in mind, the following documents on the City’s privilege log are protected by the work product doctrine: 6, 7, 8, 10, 11, 15, 16, 17, 47, 61, 76, 77, 78, 79, 81, 82, 85, 86, 89, 104, 118, 127, 129, 131, 133, 134, 135, 137, 138, 141, 149, 150, 151, 153-158, 160, 161, 162, 164, 165, 166, 167, 169, 170, 171, 172, 177, 182, 183, 184, 185, 188, 191, 192, 195-201-211, 220-230, 281, 366-371, 375, 377, 379, 381, 383-464, 466-469, 483, 484, 486-493, 498, 500. All of these documents were prepared in anticipation of this litigation or litigation with the U.S. Department of Housing and Urban Development (“HUD”) and not in the normal course of business. Of these documents, a number contain mental impressions, analyses or studies,

conclusions, opinions, or legal theories of an attorney or other representative of the City concerning this litigation or potential litigation with HUD over the Community Preference Policy. A number of the documents were created solely for analyzing settlement positions. Having reviewed these documents, the Court finds there is no substantial need for the documents and, indeed, the vast majority reflect core work product that must be protected regardless under Federal Rule of Civil Procedure 26(b)(3). *See Adlman*, 134 F.3d at 1196 (The work product doctrine “is intended to preserve a zone of privacy in which a lawyer can prepare and develop legal theories and strategy with an eye toward litigation, free from unnecessary intrusion by his adversaries”) (internal quotation marks omitted).

Additionally, with respect to documents reflecting settlement negotiations, proffers and strategy, the Court notes that such documents are inadmissible at trial under Federal Rule of Evidence 408 as evidence of the admission of the validity or invalidity of a claim. Fed. R. Evid. 408. The rationale behind the rule is that settlement proposals are irrelevant, as they “may be motivated by a desire for peace rather than from any concession of weakness of position” and “to promote settlement of disputes.” 1972 Advisory Committee Notes to Rule 408; *see also* Fed. R. Civ. P. 68 (evidence of an unaccepted offer of judgment is not admissible as evidence of liability). Rule 408 does permit admission of information that would prove bias of a witness, negate a contention of undue delay, or prove an effort to obstruct a criminal investigation or prosecution. Fed. R. Evid. 408; 1972 Advisory Committee Notes to Rule 408. The 2006 Advisory Committee Notes to Rule 408 explicitly state that the rule “prohibits use of statements made in settlement negotiations to impeach by prior inconsistent statement or through contradiction.”

2006 Advisory Committee Notes to Rule 408 (citing *EEOC v. Gear Petroleum, Inc.*, 948 F.2d 1542 (10th Cir. 1991) (letter sent as part of settlement negotiation cannot be used to impeach defense witnesses by way of contradiction or prior inconsistent statement; such broad impeachment would undermine the policy of encouraging uninhibited settlement negotiations)). Based on this Court's review of the documents concerning settlement, it is the Court's view that they could not be appropriately used for any permitted purpose under Federal Rule of Evidence 408. Therefore, they are protected from disclosure.

The following documents are not work product: 5, 24, 73, 106, 124, 125, 180, 181, 253, 254, 255, 260, 261, 328, 372, 373, 374, 376, 378, 380, 382, 499. The City acknowledged that some of these documents were not protected work product. Other documents include final versions (or portions thereof) of the City's consolidated plans concerning fair housing submitted to HUD and a factual communication to the Mayor about the filing of this litigation. Accordingly, the City must produce these documents to the extent they are not protected by another privilege. To the extent any of these documents are also marked as being protected by the deliberative process or legislative privilege, they are addressed below.

III. Deliberative Process Privilege

The deliberative process privilege, also referred to as the executive privilege, protects "documents reflecting advisory opinions, recommendations and deliberations comprising part of a process by which governmental decisions and policies are formulated." *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 150 (1975) (internal quotation marks and citation omitted). It applies to both the ultimate decision-making executive and the executive's staff members. *See*

Hopkins v. H.U.D., 929 F.2d 81, 85 (2d Cir. 1991) (work product, opinions, and recommendations of staff are covered by the deliberative process privilege).

To be protected, the documents and communications used in the decision-making process must be both (1) pre-decisional and (2) deliberative. *Marisol A. v. Guiliani*, No. 95-cv-10533 (RJW), 1998 WL 132810, at *6 (S.D.N.Y. Mar. 23, 1998). This means the document must be prepared to aid the decisionmaker in arriving at a decision as opposed to communications that are part of routine agency self-evaluation. *See, e.g., Hopkins*, 929 F.2d at 84; *Marisol A.*, 1998 WL 132810, at *6; *Tigue v. U.S. Dep't of Justice*, 312 F.3d 70, 80 (2d Cir. 2002); *see also Charles v. City of New York*, No. 11-cv-0980 (KAM) (JO), 2011 WL 5838478, at *1 (E.D.N.Y. Nov. 18, 2011).

Even if a document is protected by the deliberative process privilege, a Court may order disclosure after balancing the following five factors and finding that they weigh in favor of disclosure: (i) the relevance of the evidence sought to be protected; (ii) the availability of other evidence; (iii) the 'seriousness' of the litigation and the issues involved; (iv) the role of the government in the litigation; and (v) the possibility of future timidity by government employees who will be forced to recognize that their secrets are violable. *See* ECF 655 (citing *Rodriguez*, 280 F. Supp. 2d at 99-101); *see also In re Delphi Corp.*, 276 F.R.D. 81, 85 (S.D.N.Y. 2011); *Five Borough Bicycle Club v. City of New York*, No. 07-cv-2448 (LAK), 2008 WL 4302696, at *1 (S.D.N.Y. Sept. 16, 2008).

With these standards in mind, the following documents on the City's privilege log are protected by the deliberative process privilege: 9, 12, 21, 34, 41, 45, 48, 52, 63, 68, 83, 84, 87,

88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 145, 146, 148, 152, 168, 174, 176, 187, 189, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 305, 308, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 351, 355, 358, 465, 473, 477, 494, 496, 497. All of these documents precede a policy or other decision by a City agency and reflect the deliberative process in reaching the decision. See *Marisol A.*, 1998 WL 132810, at *6. None appear to be routine self-evaluation. On the other hand, the following documents do not reflect any pre-decisional deliberative process and fall into the category of post-decision communications, post-decision strategy for implementation of decided policy, factual information or routine self-evaluation by an agency: 20, 54, 56, 57, 58, 64, 101, 111, 112, 144, 212, 213, 214, 247, 297, 304, 310, 313, 341, 343, 350, 356, 465, 471, 475, 479, 495. Thus, these documents are not protected by the deliberative process privilege and must be disclosed by the City.

With respect to those documents that are protected by the deliberative process privilege, the Court has applied the five-factor balancing analysis in the manner prescribe by Judge Swain in her December 12, 2018 decision and determined that the following documents need not be produced: 9, 21, 34, 41, 45, 48, 52, 63, 83, 84, 87, 88, 90, 91, 103, 105, 115, 116, 117, 132, 143, 148, 152, 168, 174, 176, 187, 202, 215, 217, 234, 236, 237, 243, 244, 246, 249, 252, 257, 258, 262, 267, 268, 270, 271, 272, 276, 277, 278, 280, 283, 285, 286, 290, 293, 294, 296, 301, 308, 310, 314, 315, 316, 317-320, 322, 323, 324, 325, 326, 329, 330, 331, 332, 334, 335, 336, 337, 338, 339, 340, 348, 473, 477, 494, 496, 497. Many of these documents are drafts that are not

relevant or have marginal relevance and thus I give them little weight in the balancing test. Likewise, the availability of a final policy and other information about a policy weighs against disclosure. When evaluating the first four factors together against the fifth *Rodriguez* factor, I find that the balance of factors weighs against disclosure of these documents.

On the other hand, the five-factor balancing analysis weighs in favor of disclosure as to the following documents: 12, 68, 145, 146, 189, 277, 305, 351, 355, 358. As to these documents, the relevance factor weighs heavily in favor of disclosure and outweighs the other factors, thereby requiring disclosure.

IV. Legislative Privilege

State and local legislators are entitled to absolute “immunity from liability for their legislative acts” as a matter of federal common law. *Supreme Ct. of Virginia v. Consumers Union of U.S. Inc.*, 446 U.S. 719, 732-33 (1980) (citing *Tenney v. Brandhove*, 341 U.S. 367, 379 (1951)); *Bogan v. Scott-Harris*, 523 U.S. 44, 48-49 (1988); *see also Rodriguez*, 280 F. Supp. 2d at 94-95. Courts within the Second Circuit have repeatedly held that state and local lawmakers are entitled to protection against discovery into their legislative acts in civil cases, explaining that such protection is needed to “shield legislators from civil proceedings which disrupt and question their performance of legislative duties to enable them to devote their best efforts and full attention to the public good.” *See, e.g., Searingtown Corp. v. Inc. Vill. of N. Hills*, 575 F. Supp. 1295, 1299 (E.D.N.Y. 1981) (precluding discovery into motivation of local legislators for rezoning decision that plaintiffs claimed violated their constitutional rights) (internal quotation marks and citations omitted); *ACORN v. Cty. of Nassau*, No. 05-cv-2301 (JFB) (WDW), 2007 WL

2815810, at *2 (E.D.N.Y. Sept. 25, 2007); *see also In Vill. of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 267-68 (1977) (recognizing in dicta that the common law legislative privilege also extends to protection from compelled testimony in civil cases); *Star Distribs., Ltd. v. Marino*, 613 F.2d 4, 6-9 (2d Cir. 1980).

Legislative acts that are protected under the privilege include any activity that is an integral part of the deliberative and communicative processes by which an individual considers whether to vote for or against a proposal. *See Eastland v. U.S. Servicemen's Fund*, 421 U.S. 491, 504 (1975); *Bogan*, 523 U.S. at 54-55. For example, legislative acts may include, but are not limited to: "delivering an opinion, uttering a speech, or haranguing in debate; proposing legislation; voting on legislation; making, publishing, presenting, and using legislative reports; authorizing investigations and issuing subpoenas; and holding hearings and introducing material at committee hearings." *S.E.C. v. Comm. On Ways and Means of the U.S. House of Representatives*, 161 F. Supp. 3d 199, 236 (S.D.N.Y. 2015) (citing *Fields v. Office of Eddie Bernice Johnson*, 459 F.3d 1, 10-11 (D.C. Cir. 2006)) (internal quotation marks omitted).

The legislative privilege also protects formal and informal fact and information-gathering activities about the subject of potential legislation, as well as documents regarding or reflecting the fruits of this research. *See id.* at 236-37, 245; *see also United States v. Biaggi*, 853 F.2d 89, 102-03 (2d Cir. 1988); *McSurely v. McClellan*, 553 F.2d 1277, 1286 (D.C. Cir. 1976) (en banc), *cert. dismissed* 438 U.S. 189 (1978). The privilege does not attach to activities concerning the administration of a law, speeches delivered outside of the legislative body and preparation for the same, the making of appointments with government agencies, and

newsletters and press releases to constituents. *See U.S. v. Brewster*, 408 U.S. 501, 512 (1972); *Hutchinson v. Proxmire*, 443 U.S. 111, 130-33 (1979).

Like the deliberative process privilege, the legislative privilege is qualified, and disclosure may be ordered subject to the same balancing factors applicable to the deliberative process privilege. *Rodriguez*, 280 F. Supp. 2d at 96; *see also Citizens Union of City of N.Y. v. Att’y Gen. of N.Y.*, No. 16-cv-9592 (RMB) (KHP), 2017 WL 3836057, at *18 (S.D.N.Y. Sept. 1, 2017).

Applying these standards, this Court finds that none of the documents the City listed as protected by the legislative privilege in fact fall within the protection of this privilege. These documents are: 49, 55, 98, 99, 102, 179, 345. Thus, the City shall produce all of these documents.

Conclusion

The Court appends a spreadsheet reflecting the Court’s rulings on the 500 documents. The Court also includes its own description of the documents in column R. The City is directed to re-review its privilege log consistent with this ruling and determine whether there are additional documents on its log that must be de-designated as privileged. The City shall complete this task by January 31, 2019 and provide Plaintiffs with an updated log and supplemental production by that date.

To the extent there are objections to this ruling, or Plaintiffs believe that the Court should re-evaluate the balance of *Rodriguez* factors or wish to make a substantial need argument as to a specific document protected by the work product doctrine, this Court

requests that the parties first file a motion for reconsideration with this Court. The parties shall notify the Court by letter if they intend to request reconsideration of a ruling as to a particular document by December 31, 2018. The Court will then set a briefing schedule as to any such motion. To the extent the City does not dispute this Court's ruling with respect to documents deemed non-privileged, it shall produce such documents by January 31, 2019.

SO ORDERED.

Dated: December 18, 2018
New York, New York



KATHARINE H. PARKER
United States Magistrate Judge

Sort	Production Beginning Bates	Control ID	Privilege(s)	Categorical Description	Court Decision	Court's Summary Description of Nature of Document
0		NYCPRIVO 3014	Attorney Client;Deliberative	Draft Internal Memorandum re: AFFH and Community Preference	NP	communication among counsel and others re: delegation of responsibilities for responding to plaintiff's counsel letter re: fair housing policies
1	NYC_0067299		Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	Per City's Agreement
2	NYC_0067300		Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	
3		NYCPRIVO 0004	Attorney Client	Email chain re: Application of Community Preference	AC	communication with counsel and others re: requests to include prior residents in community preference; identifying issue for legal advice
4		NYCPRIVO 0014	Attorney Client;Deliberative	Email chain re: Community Opposition Strategies	AC & DPP	communications with counsel and others about strategy and potential positions in advance of REBNY Meeting;
5		NYCPRIVO 0015	Work Product	Email chain re: Litigation - Winfield Litigation	NP	Per City's Agreement
6		NYCPRIVO 0016	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	Settlement Options Analysis
7		NYCPRIVO 0017	Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	Settlement Options Analysis
8		NYCPRIVO 0018	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	Settlement Options Analysis
9		NYCPRIVO 0023	Deliberative	Draft Internal Memorandum re: 421-a - Homeless Preference	DPP	Draft decision memo to mayor regarding homeless unit commitment

10		NYCPRIVO 0025	Work Product	Email chain re: Litigation - Winfield Litigation	WP	Communication about preparation for legal strategy meeting with Mayor about this litigation
11		NYCPRIVO 0026	Deliberative;Work Product	Draft presentation re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	Litigation Strategy Document
12		NYCPRIVO 0047	Deliberative	Email chain re: 421-a - Homeless Preference	DPP	communication regarding potential policy re: 421a units; PRODUCE UNDER RODRIGUEZ
13		NYCPRIVO 0061	Attorney Client	Draft talking points re: MIH - Anti-displacement strategies;Anti-displacement strategies	NP	Per City's Agreement
14	NYC_0083074	NYCPRIVO 0063	Deliberative;Legislative	Draft talking points re: MIH - mobility;MIH - Community opposition;MIH - City council input	NP	Per City's Agreement
15		NYCPRIVO 0067	Work Product	Email chain re: Litigation - Winfield Litigation	WP	Communication about work needed to inform legal strategy
16		NYCPRIVO 0068	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP	Litigation Strategy memo
17		NYCPRIVO 0069	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	Settlement Options Analysis
18		NYCPRIVO 0074	Attorney Client;Deliberative;Work Product	Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation;Community Opposition Strategies	AC	draft decision memo to mayor re: rezonings in specific neighborhoods containing legal advice
19	19	NYCPRIVO 0075	Attorney Client;Deliberative;Work Product	Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation;Community Opposition Strategies	AC	draft decision memo to mayor re: rezonings in specific neighborhoods containing legal advice

20		NYCPRIVO 0083	Deliberative;Legislative	Final talking points (non-public) re: MIH - Anti-displacement strategies;MIH - City council input	NP	internal documents setting forth admin. position to certain issues; shared with CM
21		NYCPRIVO 0095	Deliberative;Legislative	Draft report re: MIH - City council input	DPP	draft considerations for potential modification to MIH; DO NOT PRODUCE UNDER RODRIGUEZ
22	NYC_0032942		Attorney Client	Draft Document re: 421-a - 2015/2016 revision	AC	Attorney comments on draft advertisement for housing on West 42nd St. sent to another City lawyer for further review
23		NYCPRIVO 0425	Attorney Client	Email chain re: Application of Community Preference	AC	communication with attorney and others concerning use of marketing bands for specific housing project; highlighting legal issues with proposed approach
24		NYCPRIVO 0435	Work Product	Email chain re: Litigation - Winfield Litigation	NP	Per City's Agreement
25		NYCPRIVO 0474	Attorney Client	Email chain re: Application of Community Preference	AC	draft language regarding housing ad sent to counsel for legal review and comment
26		NYCPRIVO 2106	Attorney Client;Deliberative	Email chain re: 421-a - Homeless Preference	AC in part	internal communications describing issue on which legal advice sought pertaining to lotteries can be redacted; document otherwise must be produced
27		NYCPRIVO 0482	Attorney Client;Deliberative	Email chain re: Application of Community Preference	AC	communications with attorney and others concerning modifications to CPP in context of preservation projects
28		NYCPRIVO 0483	Attorney Client;Deliberative	Email chain re: Application of Community Preference	AC	communications with attorney and others concerning modifications to CPP in context of preservation projects
29	NYC_0033138		Attorney Client;Deliberative	Draft report re: 421-a - 2015/2016 revision	AC	attorney summary and advice re: 421-a

30		NYCPRIVO 0501	Attorney Client	Draft talking points re: 421-a - Homeless Preference	AC	Draft of document concerning homeless referrals to 421-a projects reflecting legal advice
31		NYCPRIVO 2108	Attorney Client;Deliberative	Email chain re: 421-a - Homeless Preference;Application of Community Preference	AC	communications reflecting legal advice re: 421-a
32		NYCPRIVO 0106	Attorney Client;Deliberative	Draft talking points re: 421-a - Homeless Preference	AC	Draft of documents concerning homeless referrals to 421-a projects reflecting legal advice sought
33		NYCPRIVO 0108	Attorney Client;Deliberative	Email chain re: 421-a - Homeless Preference	AC	emails with counsel and others; seeking legal advice in context of this litigation on communications plan re: homeless referrals to 421- a projects
34		NYCPRIVO 0536	Deliberative	Draft Document re: 421-a - Homeless Preference	DPP	draft document containing comments re: homeless prevention policy and 421-a housing; DO NOT PRODUCE UNDER RODRIGUEZ
35		NYCPRIVO 0117	Attorney Client	Draft talking points re: 421-a - Homeless Preference	AC	Attorney draft of documents discussing homeless referrals to 421- a projects
36	NYC_0033169		Attorney Client	Draft talking points re: 421-a - Homeless Preference	AC	Communications with counsel and counsel's comments on draft FAQs re: homeless referrals to 421-a projects
37		NYCPRIVO 0609	Attorney Client	Email chain re: 421-a - Homeless Preference;Marketing guidelines	AC	Communications with counsel re: revisions to Marketing Handbook
38		NYCPRIVO 0611	Attorney Client	Email chain re: 421-a - Homeless Preference	AC	Communications with counsel re: revisions to Marketing Handbook
39		NYCPRIVO 0613	Attorney Client	Draft Document re: 421-a - Homeless Preference	AC	Attorney draft of memo sent to client for consideration re: homeless referrals to 421- a projects
40		NYCPRIVO 0620	Attorney Client	Draft report re: MIH - Anti- displacement strategies; 421-a - 2015/2016 revision	AC	Attorney draft of report on MIH with highlighted areas for discussion

41		NYCPRIVO 2115	Deliberative	Draft Document re: Anti-displacement strategies;Community Opposition Strategies	DPP	internal working draft reflecting tentative positions on HPD RFPs and involvement in neighborhood studies; DO NOT PRODUCE UNDER RODRIGUEZ
42		NYCPRIVO 0637	Attorney Client	Draft talking points re: 421-a - 2007 revision	AC	Draft memo re: 421-a for which legal review is requested
43		NYCPRIVO 0644	Attorney Client	Final letter (non-public) re: 421-a - 2007 revision	NP	not conveying legal advice or seeking legal advice
44		NYCPRIVO 0665	Attorney Client;Deliberative	Draft Document re: Marketing guidelines	AC	Draft of Marketing Guidelines containing counsel's comments
45		NYCPRIVO 0666	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
46		NYCPRIVO 0668	Attorney Client	Email chain re: Anti-displacement strategies;Application of Community Preference	NP	communication with counsel and others re: CPP; not seeking or reflecting legal advice
47		NYCPRIVO 0676	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Draft letter to HUD re: potential settlement
48		NYCPRIVO 0686	Deliberative	Draft report re: Application of Community Preference	DPP	draft strategy document concerning 10-year affordable housing plan in East New York; DO NOT PRODUCE UNDER RODRIGUEZ
49		NYCPRIVO 0768	Legislative	Draft talking points re: ENY - Anti-displacement strategies	NP	internal strategy document regarding East New York development issues
50		NYCPRIVO 0782	Deliberative	Email chain re: Application of Community Preference	NP	not internal - communication with city counsel;
51		NYCPRIVO 0783	Attorney Client;Deliberative	Email chain re: Application of Community Preference	AC	communication to counsel and others seeking advice re: overlapping preference categories at a specific development

52		NYCPRIVO 0788	Deliberative;Legislative	Draft presentation re: Anti-displacement strategies	DPP	draft internal presentation concerning legislative agenda, positions on 421-a and fall back positions on rent regulation and land tax; DO NOT PRODUCE UNDER RODRIGUEZ
53		NYCPRIVO 0793	Attorney Client;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	AC	communication discussing legal position in response to litigation and upcoming meeting with counsel
54		NYCPRIVO 0799	Deliberative;Legislative	Draft Document re: ENY - Anti-displacement strategies	NP	draft executive summary of affordable housing plan for East New York
55		NYCPRIVO 0827	Legislative	Draft talking points re: Anti-displacement strategies	NP	internal memo re: proposed responses to tenant harassment proposals by progressive caucus
56		NYCPRIVO 0158	Deliberative;Legislative	Email chain re: Anti-displacement strategies	NP	also concerns bill re: harassment of tenants
57		NYCPRIVO 0835	Deliberative;Legislative	Draft talking points re: ENY - Anti-displacement strategies	NP	internal memo reflecting decisionmaking re: issues to address re: East New York development
58		NYCPRIVO 0159	Deliberative	Email chain re: ENY - Anti-displacement strategies;Community Opposition Strategies	NP	internal communications re: East New York development and MIH strategy
59		NYCPRIVO 0839	Attorney Client;Work Product	Email chain re: Litigation - Other;AFFH and Community Preference	AC	document summarizes and conveys legal advice re: Consolidated Plan and ongoing litigation
60		NYCPRIVO 0842	Attorney Client;Work Product	Email chain re: Litigation - Other;AFFH and Community Preference	AC	communication with counsel re: draft 2012 Consolidated Plan to HUD re: AFFH
61		NYCPRIVO 0844	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Draft response to HUD
62		NYCPRIVO 0846	Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ

63		NYCPRIVO 2140	Deliberative	Draft Document re: Anti-displacement strategies;Community Opposition Strategies	DPP	same as 41
64		NYCPRIVO 0881	Deliberative;Legislative	Draft Document re: MIH - Anti-displacement strategies; ENY - Anti-displacement strategies;ENY - City council input	NP	internal outline of remaining considerations regarding East New York development plan;
65		NYCPRIVO 0889	Deliberative;Legislative	Draft report re: Anti-displacement strategies	NP	Per City's Agreement
66		NYCPRIVO 0891	Deliberative;Legislative	Email chain re: Anti-displacement strategies	NP	Per City's Agreement
67		NYCPRIVO 0904	Deliberative	Final presentation (non-public) re: MIH - Anti-displacement strategies	NP	
68		NYCPRIVO 0163	Deliberative	Email chain re: ENY - Anti-displacement strategies	DPP	internal communications concerning East New York development positions; PRODUCE UNDER RODRIGUEZ
69		NYCPRIVO 0690	Attorney Client	Email chain re: Application of Community Preference	AC	communication with counsel and others re: legal requirements of 421-a and applicability of various regulations to specific development
70		NYCPRIVO 0972	Attorney Client;Deliberative	Email chain re: 421-a - 2015/2016 revision;421-a - Homeless Preference	AC	Legal advice re: 421-a
71		NYCPRIVO 0973	Attorney Client;Deliberative	Draft Document re: 421-a - 2015/2016 revision;421-a - Homeless Preference	AC	Legal advice re: 421-a
72		NYCPRIVO 2768	Deliberative	Draft talking points re: Application of Community Preference	NP	Per City's Agreement
73		NYCPRIVO 2163	Work Product	Final letter (non-public) re: Litigation - Anticipated Litigation re: Community Preference	NP	Letter to HUD providing fact information
74		NYCPRIVO 1425	Deliberative	Draft talking points re: Litigation - Winfield Litigation;Application of Community Preference	NP	Per City's Agreement

75		NYCPRIVO 1426	Deliberative	Draft talking points re: Litigation - Winfield Litigation;Application of Community Preference	NP	Per City's Agreement
76		NYCPRIVO 0699	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications re: data analysis needed to determine potential settlement positions with HUD on CPP
77		NYCPRIVO 0701	Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Communications concerning draft letter to HUD and alternatives to CPP
78			Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Draft analysis of measures of demographics within CDs in connection with HUD submission
79		NYCPRIVO 0708	Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference	WP	internal statistical analysis for informing litigation strategy
80		NYCPRIVO 0709	Attorney Client;Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	AC	Discloses topic of legal advice and responses to Plaintiffs' counsel and draft communication to HUD
81		NYCPRIVO 0719	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform legal strategy
82		NYCPRIVO 0720	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications re: data analysis needed to determine potential settlement positions with HUD on CPP
83		NYCPRIVO 0724	Deliberative	Internal Charts or Maps;Notes re: Anti- displacement strategies	DPP	CHART RE: PROGRESS ON VARIOUS STRATEGIC PRESERVATION INITIATIVES, REFLECTS INTERNAL WORKING PROCESS; DO NOT PRODUCE UNDER RODRIGUEZ
84		NYCPRIVO 0731	Deliberative	Draft presentation re:	DPP	SAME AS 52

85		NYCPRIVO 0145	Work Product	Draft report re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation
86		NYCPRIVO 0146	Deliberative; Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference; Litigation - Winfield Litigation	WP & DPP	analysis prepared to inform litigation strategy and settlement
87		NYCPRIVO 0742	Deliberative; Work Product (withdrawn)	Draft report re: Litigation - Anticipated Litigation re: Community Preference	DPP	Work product withdrawn; draft report re: MIH policy reflecting input from various individuals; precedes counsel vote on MIH; DO NOT PRODUCE UNDER RODRIGUEZ
88		NYCPRIVO 0752	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
89		NYCPRIVO 0150	Deliberative; Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform legal strategy and settlement
90		NYCPRIVO 0994	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
91	NYC_0076061	NYCPRIVO 0997	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
92		NYCPRIVO 0999	Attorney Client; Deliberative	Draft Document re: Marketing guidelines	AC	communications re: sections of 2016 Marketing Guidelines and attorney advice re: certain sections
93		NYCPRIVO 1000	Attorney Client; Deliberative	Email chain re: Application of Community Preference	AC	communications with counsel and others re: inclusion of prior residents in community preference for various projects

94		NYCPRIVO 1003	Attorney Client	Email chain re: North Brooklyn Rezoning and Demographics	AC	communications with counsel re: requests to include prior residents in community preference, pre-policy discussion re: policy
95		NYCPRIVO 2149	Attorney Client;Deliberative	Email chain re: MIH - Anti-displacement strategies;MIH - Community opposition	NP	Per City's Agreement
96		NYCPRIVO 1431	Attorney Client;Legislative	Email chain re: City Council Input;Application of Community Preference	AC	communications discussing advice of counsel re: community preference with regard to specific project
97		NYCPRIVO 2174	Attorney Client;Deliberative;Legislative	Draft report re: MIH - Anti-displacement strategies;MIH - Community opposition;MIH - City council input;Community Opposition Strategies	AC	draft internal report concerning MIH and 421-a sent to counsel for legal comment
98		NYCPRIVO 1438	Legislative	Email chain re: Application of Community Preference	NP	communications about AMI and CPP as to specific development
99		NYCPRIVO 1439	Legislative	Email chain re: Application of Community Preference	NP	communications about AMI and CPP as to specific development
100		NYCPRIVO 1441	Attorney Client;Deliberative	Draft Document re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
101		NYCPRIVO 2175	Deliberative	Email chain re: Application of Community Preference	NP	communications regarding CPP
102		NYCPRIVO 1442	Legislative	Email chain re: Application of Community Preference	NP	communications about Bronx Commons development
103		NYCPRIVO 0180	Deliberative	Internal Memorandum re: 421-a - Homeless Preference	DPP	draft decision memo to mayor re: homeless unit commitment; DO NOT PRODUCE UNDER RODRIGUEZ
104		NYCPRIVO 0189	Deliberative;Work Product	Email chain re: Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications concerning information needed to evaluate changes to CPP and settlement position with HUD

105		NYCPRIVO 0191	Deliberative	Draft report re: MIH - mobility	DPP	SAME AS 87
106		NYCPRIVO 1510	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	NP	Per City's Agreement
107		NYCPRIVO 1511	Deliberative	Draft talking points re: Anti-displacement strategies	NP	Per City's Agreement
108		NYCPRIVO 1540	Deliberative	Email chain re: Anti-displacement strategies;Application of Community Preference	NP	Per City's Agreement
109		NYCPRIVO 1549	Attorney Client;Deliberative	Internal Memorandum re: Commitment to Fair Housing	AC	Draft decision memo on MIH and stating understanding of legal advice
110		NYCPRIVO 1556	Attorney Client;Deliberative;Work Product	Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference	AC	draft decision memo to mayor on creation of MIH program containing and seeking legal advice
111		NYCPRIVO 1578	Deliberative;Legislative	Email chain re: Application of Community Preference	NP	communication regarding inquiry about application of CPP
112		NYCPRIVO 1584	Deliberative;Legislative	Email chain re: Application of Community Preference	NP	communication regarding inquiry about application of CPP
113		NYCPRIVO 1591	Attorney Client;Deliberative	Email chain re: ENY - Anti-displacement strategies;Application of Community Preference	AC	communication with counsel re: legal advice on language in draft document concerning CPP
114		NYCPRIVO 1592	Attorney Client;Deliberative	Email chain re: ENY - Anti-displacement strategies;Application of Community Preference	AC	communication with counsel re: legal advice on language in draft document concerning CPP
115		NYCPRIVO 0206	Deliberative	Draft Internal Memorandum re: Anti-displacement strategies	DPP	draft decision memo to mayor re: legal services RFP; DO NOT PRODUCE UNDER RODRIGUEZ
116		NYCPRIVO 1617	Deliberative	Draft presentation re: MIH - Anti-displacement strategies;MIH - Community opposition;MIH - City council input	DPP	internal draft of considerations for MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ

117		NYCPRIVO 1620	Deliberative	Draft presentation re: MIH - Anti-displacement strategies;MIH - Community opposition;MIH - City council input	DPP	internal draft of considerations for MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ
118	NYC_0073100		Deliberative;Work Product	Email chain re: Litigation - Winfield Litigation	WP	Communications regarding this litigation and statement about it to provide to HUD
119		NYCPRIVO 0220	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	Per City's Agreement
120		NYCPRIVO 1659	Attorney Client;Deliberative	Draft talking points re: 421-a - Homeless Preference	AC	internal draft talking points in advance of meeting with REBNY containing attorney input and strategy
121		NYCPRIVO 1661	Deliberative	Email chain re: ENY - Anti-displacement strategies;Community Opposition Strategies	DPP	internal communications re: non-final talking points about non-final commitments in advance of release of Inwood Development Plan; DO NOT RELEASE UNDER RODRIGUEZ
122		NYCPRIVO 1662	Attorney Client	Email chain re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
123		NYCPRIVO 1663	Attorney Client	Email chain re: 421-a - Homeless Preference	AC	Communication with counsel and others; seeking legal advice on planned communications re: homeless policy as it relates to CPP
124		NYCPRIVO 1666	Work Product	Email chain re: Litigation - Winfield Litigation	NP	Per City's Agreement
125		NYCPRIVO 1667	Deliberative;Work Product	Email chain re: Anti-displacement strategies; Litigation - Winfield Litigation	NP	Per City's Agreement
126		NYCPRIVO 1723	Attorney Client;Deliberative	Email chain re: Application of Community Preference	AC	communication with counsel and others seeking legal advice on homeless referrals to a specific project
127		NYCPRIVO 1026	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	Discussion about how to conduct data analysis to answer HUD request

128		NYCPRIVO 1726	Attorney Client;Deliberative	Email chain re: Application of Community Preference	NP	email seeking legal advice, among other input, on a specific application of CPP
129		NYCPRIVO 1034	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	analysis to inform litigation strategy
130		NYCPRIVO 0237	Attorney Client;Deliberative	Email chain re: 421-a - Homeless Preference;Application of Community Preference	NP	Per City's Agreement
131		NYCPRIVO 1037	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	summary of info discussed at settlement meeting with HUD re: HUD data requests for alternative to CPP
132		NYCPRIVO 1737	Deliberative;Legislative	Email chain re: ENY - Anti-displacement strategies	DPP	internal communications re: East New York development and strategy; DO NOT PRODUCE UNDER RODRIGUEZ
133		NYCPRIVO 1039	Deliberative (withdrawn);Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	information and data collected to inform settlement strategy with HUD
134		NYCPRIVO 1058	Deliberative;Work Product	Draft report re: Anti-displacement strategies; Litigation - Winfield Litigation	WP	Draft PPT re: alternatives to CPP to inform strategy in litigation
135		NYCPRIVO 1066	Deliberative;Work Product	Internal Charts or Maps re: Anti-displacement strategies	WP	email re: gentrification map in connection with planning changes to CPP for settlement
136		NYCPRIVO 1067	Attorney Client;Deliberative	Draft report re: Marketing guidelines	AC	revisions to Marketing handbook sent to counsel for comment
137		NYCPRIVO 1070	Deliberative;Work Product	Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation	WP & DPP	gentrification map for planning changes to CPP for settlement
138		NYCPRIVO 1071	Deliberative;Work Product	Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation	WP & DPP	gentrification map for planning changes to CPP for settlement
139		NYCPRIVO 1075	Attorney Client;Legislative;Work Product	Email chain re: City Council Input; Litigation - Anticipated Litigation re: Community Preference	AC	email chain with counsel and others re: response to Plaintiff's counsel and draft letter to HUD

140	NYC_0076236	NYCPRIVO 1117	Attorney Client;Deliberative;Work Product	Draft presentation re: Litigation - Anticipated Litigation re: Community Preference;Neighborhood Demographics	AC	document discussing strategies for negotiations with HUD re: community preference; legal advice on document sought
141		NYCPRIVO 1122	Attorney Client;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;AFFH and Community Preference	WP & DPP	ppt re: option for analyzing various aspects of CDs in connection with changes to CPP as part of litigation
142		NYCPRIVO 2150	Attorney Client	Email chain;Draft Document re: OTHER	AC	communications identifying portions of draft document where legal advice is sought and discussing legal review of same
143		NYCPRIVO 1222	Deliberative;Legislative	Email chain re: Anti- displacement strategies	DPP	internal communications re: East New York development and MIH strategy; DO NOT PRODUCE UNDER RODRIGUEZ
144		NYCPRIVO 1231	Deliberative	Email chain re: Anti- displacement strategies;Application of Community Preference	NP	email re: application of CPP
145		NYCPRIVO 1292	Deliberative	Email chain re: Community Opposition Strategies	DPP	communications concerning preliminary responses to community questions about Community Housing Plan - PRODUCE UNDER RODRIGUEZ
146		NYCPRIVO 1294	Deliberative	Notes re: Anti- displacement strategies;Commitment to Fair Housing	DPP	internal notes reflecting Meltzer's thoughts on contract with NEIGHBORHOOD PRESERVATION CONSULTANT program and displacement mitigation strategies - PRODUCE UNDER RODRIGUEZ
147		NYCPRIVO 1298	Deliberative	Draft report re: ENY - Anti- displacement strategies;ENY - Community opposition	NP	Per City's Agreement

148		NYCPRIVO 1302	Deliberative	Final report (non-public); Draft Document re: Anti-displacement strategies	DPP	concept paper in advance of RFP for Neighborhood Preservation Consultant contract to assist HPD in preserving affordable housing stock; lays out goals, elements and parameters of new model for program - not final parameters of program - DO NOT PRODUCE UNDER RODRIGUEZ
149		NYCPRIVO 2151	Work Product	Email chain re: Litigation - Winfield Litigation	WP	Concerns literature review on gentrification and economic diversity; FOR SETTLEMENT
150		NYCPRIVO 1342	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation
151		NYCPRIVO 1349	Deliberative; Work Product	Email chain re: Litigation - Winfield Litigation	WP & DPP	email discussion regarding options for changes to CPP in connection with settlement positions
152		NYCPRIVO 1353	Deliberative	Email chain re: MIH - Anti-displacement strategies	DPP	communications setting forth preliminary thoughts about creation of HousingStat (a computer program to help officials and nonprofits prevent displacement and protect stock of affordable housing) - DO NOT PRODUCE UNDER RODRIGUEZ
153		NYCPRIVO 1358	Deliberative; Work Product	Email chain re: Litigation - Winfield Litigation	WP & DPP	email discussion re: settlement positions on CPP
154		NYCPRIVO 2153	Work Product	Email chain re: Litigation - Winfield Litigation	WP	Communication about work needed to inform legal strategy
155		NYCPRIVO 2154	Work Product	Notes re: Anti-displacement strategies; Litigation - Winfield Litigation	WP	Summary of fact research done for litigation and reflects litigation strategy
156		NYCPRIVO 1366	Deliberative; Work Product	Email chain re: Litigation - Winfield Litigation	WP & DPP	email discussion re: settlement positions on CPP
157		NYCPRIVO 1367	Deliberative; Work Product	Email chain re: Litigation - Winfield Litigation	WP & DPP	email discussion re: settlement positions on CPP

158		NYCPRIVO 1374	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	email discussion re: settlement positions on CPP
159		NYCPRIVO 1375	Attorney Client;Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	AC	communications with counsel and others re: legal strategy and defenses
160		NYCPRIVO 1377	Work Product	Email chain re: Litigation - Winfield Litigation	WP	Describes work done for informing litigation and settlement strategy
161		NYCPRIVO 1378	Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP & DPP	legal materials re: settlement positions
162		NYCPRIVO 1384	Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP & DPP	legal materials re: settlement positions
163		NYCPRIVO 1746	Attorney Client	Email chain re: Application of Community Preference	AC	communications with counsel and others re: draft statement about community preference
164		NYCPRIVO 1386	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	legal materials re: settlement positions
165		NYCPRIVO 1392	Attorney Client;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	legal materials re: settlement positions
166		NYCPRIVO 1398	Attorney Client;Work Product	Email chain re: Litigation - Winfield Litigation	WP	legal materials re: settlement positions
167		NYCPRIVO 1399	Work Product	Email chain re: Litigation - Winfield Litigation	WP	Describes work done for informing litigation and settlement strategy
168		NYCPRIVO 1752	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
169		NYCPRIVO 0245	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	communications concerning legislative history of CPP and search for same
170		NYCPRIVO 0263	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communications concerning potential changes to CPP in context of settlement discussion with HUD; DO NOT PRODUCE UNDER RODRIGUEZ

171		NYCPRIVO 0264	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	analysis to inform litigation strategy and settlement
172		NYCPRIVO 0265	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	communications concerning letter to HUD re: alternatives to CPP
173		NYCPRIVO 1760	Deliberative;Legislative	Email chain re: City Council Input;Application of Community Preference	NP	communicatons concerning development at 168th St. and response to counsel member concerns
174		NYCPRIVO 0274	Deliberative	Draft presentation re: Anti- displacement strategies; 421-a - 2015/2016 revision	DPP	Same as 52
175		NYCPRIVO 0278	Attorney Client	Email chain re: Application of Community Preference	AC	communication with counsel and others seeking advice on application of preferences at a specific development
176		NYCPRIVO 0280	Attorney Client;Deliberative;Work Product	Final letter (non-public) re: Litigation - Anticipated Litigation re: Community Preference	DPP	Not attorney-client because sent to HUD; Letter from Been to HUD GC re: Settlement Proposal; DO NOT PRODUCE UNDER RODRIGUEZ
177		NYCPRIVO 0281	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
178		NYCPRIVO 0292	Attorney Client;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	AC & WP	Communication with counsel; discussion anticipated litigation, FOIL request and potential fact development for litigation
179		NYCPRIVO 0293	Legislative	Email chain re: Application of Community Preference	NP	emails between Garodnick and Been re: CPP
180		NYCPRIVO 0295	Work Product	Email chain re: Litigation - Winfield Litigation	NP	draft communication to mayor about filing of this suit
181		NYCPRIVO 0306	Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP	communications about this litigation and providing statement to HUD re: same

182		NYCPRIVO 0309	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
183		NYCPRIVO 0321	Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference	WP	Analysis of ACS demographic and housing estimates based on census tracts
184		NYCPRIVO 0322	Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP	Atty questions re: CPP and statistical tests
185	NYC_0072746	NYCPRIVO 0329	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP	Draft Letter from Been to HUD GC re: settlement
186		NYCPRIVO 1780	Attorney Client	Final report (non-public) re: Marketing guidelines	NP	
187		NYCPRIVO 1791	Deliberative	Draft Document re: Marketing guidelines	DPP	draft marketing guidelines to be submitted to legal for review and approval; DO NOT PRODUCE UNDER RODRIGUEZ
188		NYCPRIVO 0338	Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Internal communication regarding analysis of litigation risk and settlement possibility with HUD
189		NYCPRIVO 0339	Deliberative	Email chain re: Litigation - Anticipated Litigation re: Community Preference	DPP	communications about potential changes to CPP and communications with CM Greenfield - PRODUCE UNDER RODRIGUEZ
190		NYCPRIVO 0340	Attorney Client	Email chain re: Application of Community Preference;Community Opposition Strategies	AC	communication with counsel and other seeking advice re: public statement about CPP
191		NYCPRIVO 0341	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP	Communications with HUD and then internal communications re: settlement discussions with HUD re: CPP
192		NYCPRIVO 0342	Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	communication concerning proposed communication with HUD re: alternatives to CPP

193		NYCPRIVO 0345	Attorney Client;Deliberative	Draft Internal Memorandum re: AFFH and Community Preference;Community Opposition Strategies	AC	decision memo to Mayor making recommendations and conveying legal advice re: rezoning in specific neighborhood
194		NYCPRIVO 1835	Attorney Client;Deliberative	Internal Memorandum re: Commitment to Fair Housing	AC	Decision memo to Mayor re: rezoning in specific neighborhoods and containing legal advice
195		NYCPRIVO 1841	Work Product	Final report (non-public) re: Litigation - Winfield Litigation	WP	Notes on property portfolios and includes Winfield litigation strategy comments
196		NYCPRIVO 0351	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
197		NYCPRIVO 0352	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
198		NYCPRIVO 0353	Work Product	Draft presentation re: Litigation - Winfield Litigation	WP	Legal communication and analysis of case
199		NYCPRIVO 0354	Deliberative;Work Product	Notes re: 421-a - 2015/2016 revision; Litigation - Winfield Litigation	WP & DPP	Notes concerning considerations for determining policy regarding 421a and changes to law
200		NYCPRIVO 0355	Deliberative;Work Product	Notes re: Litigation - Winfield Litigation	WP	list of questions to consider re: possible changes to CPP
201		NYCPRIVO 0356	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
202		NYCPRIVO 0363	Deliberative	Draft Internal Memorandum re: Anti-displacement strategies	DPP	internal draft re: preservation initiatives; DO NOT PRODUCE UNDER RODRIGUEZ
203		NYCPRIVO 0367	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement

204		NYCPRIVO 0368	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
205		NYCPRIVO 0378	Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
206		NYCPRIVO 0379	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation
207		NYCPRIVO 0380	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation
208		NYCPRIVO 0382	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation - MAP
209		NYCPRIVO 0391	Work Product	Draft presentation re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
210		NYCPRIVO 0392	Deliberative;Work Product	Draft letter re: Litigation - Anticipated Litigation re: Community Preference	WP	Draft Letter from Been to HUD GC re: settlement
211		NYCPRIVO 0393	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Settlement analysis for considering options for CPP changes in connection with litigation - MAP
212		NYCPRIVO 0394	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
213		NYCPRIVO 0395	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
214		NYCPRIVO 0396	Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	draft internal Q&A re: 421a Homeless preference; contains interpretation of 421a
215		NYCPRIVO 0402	Deliberative;Legislative	Draft talking points re: MIH - Anti-displacement strategies	DPP	same as 83
216		NYCPRIVO 1843	Attorney Client;Deliberative	Internal Memorandum re: 421-a - 2015/2016 revision	AC	legal summary for client re: 421-a

217		NYCPRIVO 1850	Deliberative	Draft report re: Application of Community Preference;Marketing guidelines	DPP	draft section of marketing handbook; DO NOT PRODUCE UNDER RODRIGEZ
218		NYCPRIVO 1855	Attorney Client;Deliberative	Internal Memorandum re: 421-a - Homeless Preference	AC	Memo reflecting opinions of HPD Legal Affairs and Law Department on tenant selection and requested for determining policy re: same
219		NYCPRIVO 1863	Deliberative	Draft talking points re: Anti-displacement strategies	NP	draft Q&As re: affordable housing in connection with 2015 mayor state of city address
220	NYC_0067398		Work Product	Draft Document re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP	Draft questions for analysis for formulating litigation strategy
221	NYC_0067400		Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
222	NYC_0067402		Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
223	NYC_0067405		Work Product	Final presentation (non-public) re: Litigation - Winfield Litigation	WP	Legal communication and analysis of case
224	NYC_0067416		Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
225	NYC_0067418		Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference	WP & DPP	analysis to inform litigation strategy and settlement
226	NYC_0067422		Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
227	NYC_0067424		Deliberative;Work Product	Notes re: Litigation - Anticipated Litigation re: Community Preference	WP	notes reflect communications with HUD re: settlement of issues raised about CPP
228	NYC_0067425		Work Product	Notes re: Litigation - Winfield Litigation	WP	Reflects attorney questions and information gathering for litigation
229	NYC_0067426		Work Product	Notes re: Litigation - Winfield Litigation	WP	Reflects potential analyses for informing litigation strategy

230	NYC_0067431		Work Product	Draft presentation re: Litigation - Winfield Litigation	WP	Draft presentation re: litigation for informing litigation strategy
231	NYC_0067438		Deliberative	Draft talking points re: MIH - Community opposition; Anti-displacement strategies; Commitment to Fair Housing	NP	Notes for discussion with NYT about fair housing; does not reflect decisionmaking on policy
232		NYCPRIVO 1867	Attorney Client; Legislative (Withdrawn); Deliberative	Email chain re: Application of Community Preference	AC	Withdraw legislative privilege; adding DPP; communications with counsel and others to provide legal advice regarding proposed application of CPP to displaced tenants of Greenpoint/Wilmsburg
233		NYCPRIVO 1874	Attorney Client; Deliberative	Draft report re: Application of Community Preference	NP	Per City's Agreement
234		NYCPRIVO 1882	Deliberative	Draft report re: Anti-displacement strategies	DPP	draft of proposed new housing marketplace plan; DO NOT PRODUCE UNDER RODRIGUEZ
235		NYCPRIVO 1884	Attorney Client	Email chain re: Application of Community Preference	AC	communications with counsel discussing potential legislation and conveying legal advice
236		NYCPRIVO 2774	Deliberative	Draft report re: Litigation - Winfield Litigation; Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
237		NYCPRIVO 2775	Deliberative	Draft report re: Litigation - Winfield Litigation; Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
238		NYCPRIVO 2782	Attorney Client; Deliberative	Draft report re: Commitment to Fair Housing	AC & DPP	draft of 2016 consolidated plan re: AFFH sent to counsel for comments
239		NYCPRIVO 2783	Attorney Client; Deliberative	Draft report re: Commitment to Fair Housing	AC & DPP	draft of 2016 consolidated plan re: AFFH sent to counsel for comments
240		NYCPRIVO 2784	Attorney Client; Deliberative	Draft report re: AFFH and Community Preference	AC & DPP	draft of 2016 consolidated plan re: AFFH sent to counsel for
241		NYCPRIVO 2785	Attorney Client; Deliberative	Draft report re: AFFH and Community Preference; Commitment to Fair Housing	AC & DPP	draft of 2016 consolidated plan re: AFFH sent to counsel for comments

242		NYCPRIVO 2797	Attorney Client;Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	AC & DPP	draft of 2016 consolidated plan sections re: AFFH sent to counsel for comments
243		NYCPRIVO 2800	Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
244		NYCPRIVO 2807	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for Fair Housing Statement to be included in AFFH Plan; DO NOT PRODUCE UNDER RODRIGUEZ
245		NYCPRIVO 2812	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	AC & DPP	draft submission to HUD re AFFH seeking comments from multiple agencies to submit to legal
246		NYCPRIVO 2825	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
247		NYCPRIVO 2828	Deliberative	Email chain re: Commitment to Fair Housing	NP	email re: language for inclusion in AFFH document RE: 5-yr needs for HPD Fair Housing Program
248		NYCPRIVO 2832	Attorney Client;Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	AC & DPP	draft of 2010 AFFH statement for HUD sent to counsel for comments
249		NYCPRIVO 2859	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
250		NYCPRIVO 2885	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	AC & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
251		NYCPRIVO 2897	Attorney Client;Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	AC & DPP	draft of 2012 consolidated plan re: AFFH sent to counsel for comments
252		NYCPRIVO 2899	Deliberative	Draft report re: Anti-displacement strategies	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ

253		NYCPRIVO 2905	Attorney Client;Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;Commitment to Fair Housing	NP	Excerpt AFFH update from 2011 consolidated plan
254		NYCPRIVO 2906	Attorney Client;Work Product	Final report (non-public) re: Litigation - Winfield Litigation;Commitment to Fair Housing	NP	2011 consolidated plan re: AFFH to HUD
255		NYCPRIVO 2911	Attorney Client;Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;Commitment to Fair Housing	NP	Per City's Agreement
256		NYCPRIVO 2913	Attorney Client;Deliberative	Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing	AC & DPP	draft of 2013 consolidated plan re: AFFH sent to counsel for comments
257		NYCPRIVO 2924	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft sections for 2013 Consolidated Plan AFFH; DO NOT PRODUCE UNDER RODRIGUEZ
258		NYCPRIVO 2939	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
259		NYCPRIVO 2943	Attorney Client;Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Other;AFFH and Community Preference;Commitment to Fair Housing	AC	Communication with attorney re: draft submission to HUD and legal issues re: same
260		NYCPRIVO 2953	Attorney Client;Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;((Litigation))	NP	2007 Final Consolidated Plan AFFH Annual Performance Report to HUD
261		NYCPRIVO 2954	Attorney Client;Deliberative;Work Product	Final report (non-public) re: Litigation - Anticipated Litigation re: Community Preference;Commitment to Fair Housing	NP	Excerpt AFFH update from 2008 consolidated plan
262		NYCPRIVO 2967	Deliberative	Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ

263		NYCPRIVO 2968	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
264		NYCPRIVO 2969	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
265		NYCPRIVO 2970	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
266		NYCPRIVO 2973	Attorney Client;Deliberative	Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing	AC & DPP	draft of portion of AFFH- related document sent to counsel for comments
267	NYC_0085477	NYCPRIVO 3002	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
268	NYC_0085478	NYCPRIVO 3003	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
270		NYCPRIVO 3015	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
271		NYCPRIVO 3016	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
272		NYCPRIVO 3025	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
273		NYCPRIVO 3055	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
274		NYCPRIVO 3070	Attorney Client;Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Other;AFFH and Community Preference;Commitment to Fair Housing	AC & WP	Communication with attorney re: draft submission to HUD and legal issues re: same

275		NYCPRIVO 3093	Attorney Client;Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Other;AFFH and Community Preference;Commitment to Fair Housing	AC & WP	Communication with attorney re: draft submission to HUD and legal issues re: same
276		NYCPRIVO 3122	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
277		NYCPRIVO 3124	Deliberative	Email chain re: Commitment to Fair Housing	DPP	email re: language for inclusion in AFFH document RE: 5-year needs for HPD Fair Housing Program; DO NOT PRODUCE PURSUANT TO RODRIGUEZ
278		NYCPRIVO 3126	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
279		NYCPRIVO 3131	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
280		NYCPRIVO 3149	Deliberative	Draft report re: Neighborhood Demographics;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
281	NYC_0085800	NYCPRIVO 3157	Work Product	Draft report re: Litigation - Anticipated Litigation re: Community Preference;Application of Community Preference	WP	Internal communication concerning response to plaintiff's counsel's letter re: AFFH
282		NYCPRIVO 3182	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments do multiple agencies to submit to legal
283		NYCPRIVO 3185	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
284		NYCPRIVO 3202	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal

285		NYCPRIVO 3212	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
286		NYCPRIVO 3226	Deliberative	Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
287	NYC_0085811	NYCPRIVO 3235	Attorney Client;Deliberative	Draft report re: Neighborhood Demographics;Commitme nt to Fair Housing	AC	Draft of information for 2012 consolidated plan submitted to attorneys for advice
288	NYC_0085819	NYCPRIVO 3237	Attorney Client;Deliberative;Work Product	Email chain re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Other;AFFH and Community Preference;Commitment to Fair Housing	AC & WP	Communication with attorney re: draft submission to HUD and legal issues re: same
289		NYCPRIVO 3240	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
290		NYCPRIVO 3250	Deliberative	Draft letter re: Anti- displacement strategies;Commitment to Fair Housing	DPP	draft of strategic plan for 2015-2019 and potential actions for Consolidated Plan years; DO NOT PRODUCE UNDER RODRIGUEZ
291		NYCPRIVO 3264	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments of multiple agencies to submit to legal
292		NYCPRIVO 3265	Attorney Client;Deliberative	Draft report re: Commitment to Fair Housing	WP & DPP	draft submission to HUD re AFFH seeking comments do multiple agencies to submit to legal
293		NYCPRIVO 3277	Attorney Client (withdrawn);Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	DPP	AC withdrawn; draft of housing plan; final publicly available; DO NOT PRODUCE UNDER RODRIGUEZ
294		NYCPRIVO 3280	Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	DPP	working draft for anticipated 10-year affordable housing plan; DO NOT PRODUCE UNDER RODRIGUEZ

295		NYCPRIVO 3283	Attorney Client;Deliberative	Draft talking points re: Anti-displacement strategies;Commitment to Fair Housing	AC & DPP	draft of Q&As re: not yet final housing plan sent to counsel for review and comment
296		NYCPRIVO 3284	Deliberative	Draft report re: MIH - mobility	DPP	draft outline concerning MIH policy considerations and action items; DO NOT PRODUCE UNDER RODRIGUEZ
297		NYCPRIVO 3294	Deliberative	Draft talking points re: Anti-displacement strategies;Commitment to Fair Housing	NP	draft Q&A re: 10-year housing plan under deBlasio and MIH
298		NYCPRIVO 1896	Attorney Client;Deliberative	Draft Document re: MIH - mobility	AC & DPP	communication with counsel and others seeking comments on draft document re: MIH
299	NYC_0080435	NYCPRIVO 3314	Deliberative	Final report (non-public) re: Anti-displacement strategies	NP	Strategy slide re: East NY Community Plan and Housing NY
300		NYCPRIVO 3319	Attorney Client;Deliberative	Draft Internal Memorandum re: MIH - Anti-displacement strategies;Application of Community Preference	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
301		NYCPRIVO 3337	Deliberative	Email chain re: 421-a - 2015/2016 revision	DPP	communications re: policy considerations for anticipated MIH policy; DO NOT PRODUCE UNDER RODRIGUEZ
302		NYCPRIVO 3347	Deliberative	Email chain re: Neighborhood Demographics	NP	emails concerning presentation for Oct. 23 retreat
303		NYCPRIVO 3348	Deliberative	Draft report re: Neighborhood Demographics	NP	Per City's Agreement
304		NYCPRIVO 3359	Deliberative	Draft Internal Memorandum re: North Brooklyn Rezoning and Demographics	NP	transition memo re: development in various neighborhoods
305		NYCPRIVO 3369	Deliberative	Final letter (non-public) re: ENY - Anti-displacement strategies;ENY - Community opposition	NP	letter from office of comptroller to city planning re: East NY Community plan and MIH
306		NYCPRIVO 3370	Attorney Client;Deliberative	Draft report re: MIH - Anti-displacement strategies;Application of Community Preference	AC & DPP	draft of possible modifications to MIH plan submitted to counsel for advice and comment
307		NYCPRIVO 3373	Deliberative	Draft letter re: MIH - Anti-displacement strategies;MIH - Community opposition	NP	Per City's Agreement

308		NYCPRIVO 3374	Deliberative	Draft letter re: ENY - Anti-displacement strategies;ENY - Community opposition;ENY - Investment in Communities	DPP	internal draft letter in response to comptroller concerns re: East NY Community plan and MIH; produce final; draft DO NOT PRODUCE UNDER RODRIGUEZ
309		NYCPRIVO 3390	Deliberative	Final letter (non-public) re: Community Opposition Strategies	NP	letter from City Counsel re: rezoning in Bushwick
310		NYCPRIVO 3396	Deliberative	Draft talking points re: ENY - Anti-displacement strategies;ENY - Investment in Communities;Application of Community Preference	NP	
311		NYCPRIVO 3406	Deliberative	Draft talking points re: MIH - Anti-displacement strategies	NP	presentation to mayor in advance for a town hall meeting
312		NYCPRIVO 3407	Deliberative	Final talking points (non-public) re: MIH - Anti-displacement strategies;421-a - Homeless Preference	NP	Q&As for meeting on senior housing
313		NYCPRIVO 3410	Deliberative	Draft report re: ENY - Anti-displacement strategies;ENY - Community opposition	NP	draft of East NY affordable housing plan seeking public input to refine plan for public review
314		NYCPRIVO 3413	Deliberative	Draft report re: Neighborhood Demographics	DPP	draft memo including recommendations for land use, zoning, and other matters in connection with affordable housing in East New York; DO NOT PRODUCE UNDER RODRIGUEZ
315		NYCPRIVO 3415	Deliberative	Draft report re: Neighborhood Demographics	DPP	SAME AS 314
316	NYC_0081650	NYCPRIVO 3416	Deliberative	Draft report re: Anti-displacement strategies	DPP	highlighted internal summary of possible changes to policies affecting affordable housing in Crown Heights West; DO NOT PRODUCE UNDER RODRIGUEZ
317		NYCPRIVO 3417	Deliberative	Draft report re: Neighborhood Demographics	DPP	SAME AS 314
318		NYCPRIVO 3418	Deliberative	Draft report re: Neighborhood Demographics	DPP	SAME AS 314

319		NYCPRIVO 3419	Deliberative	Draft report re: Neighborhood Demographics	DPP	SAME AS 314
320		NYCPRIVO 3420	Deliberative	Draft report re: Neighborhood Demographics	DPP	SAME AS 314
321		NYCPRIVO 3422	Attorney Client	Email chain re: Application of Community Preference	NP	not conveying legal advice or seeking legal advice
322		NYCPRIVO 3426	Deliberative	Draft report re: Application of Community Preference	DPP	Project briefing memo for Hunter's Point South development for decisionmaking concerning affordable housing strategies in neighborhood; DO NOT PRODUCE UNDER RODRIGUEZ
323		NYCPRIVO 1910	Deliberative;Work Product (withdrawn)	Draft presentation re: Litigation - Anticipated Litigation re: Community Preference	DPP	Withdrawing WP; draft of Fair Housing Assessment Tool outline reflecting internal thoughts regarding how to comply with 2015 rule change; DO NOT PRODUCE UNDER RODRIGUEZ
324		NYCPRIVO 3430	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
325		NYCPRIVO 3436	Deliberative	Draft report re: Anti- displacement strategies;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
326		NYCPRIVO 3456	Deliberative	Draft report re: Anti- displacement strategies	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
327		NYCPRIVO 1911	Deliberative	Final report (non-public) re: Anti-displacement strategies	NP	report on public housing needs
328		NYCPRIVO 3478	Work Product	Draft report re: Litigation - Anticipated Litigation re: Community Preference;Application of Community Preference	NP	Per City's Agreement

329		NYCPRIVO 3481	Deliberative	Draft report re: Anti-displacement strategies;Neighborhood Demographics;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
330		NYCPRIVO 3487	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
331		NYCPRIVO 3499	Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
332		NYCPRIVO 3590	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
333		NYCPRIVO 3600	Deliberative	Internal Memorandum re: AFFH and Community Preference	NP	
334		NYCPRIVO 3634	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
335		NYCPRIVO 3703	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
336		NYCPRIVO 3710	Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
337		NYCPRIVO 3761	Deliberative	Draft report re:	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
338		NYCPRIVO 3766	Deliberative	Draft report re: Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ
339		NYCPRIVO 3904	Deliberative	Draft report re: Neighborhood Demographics;Commitment to Fair Housing	DPP	draft language for including in AFFH Consolidated Plan; DO NOT PRODUCE UNDER RODRIGUEZ

340		NYCPRIVO 2191	Deliberative	Draft report re: MIH - Anti-displacement strategies;MIH - Community opposition	DPP	Draft portion of 10-year housing plan; produce final 10-YEAR PLAN; DO NOT PRODUCE UNDER RODRIGUEZ
341		NYCPRIVO 2395	Deliberative	Internal Memorandum re: Litigation - Winfield Litigation	NP	Per City's Agreement
342		NYCPRIVO 2396	Attorney Client	Email chain re: Application of Community Preference	NP	not conveying legal advice or seeking legal advice
343		NYCPRIVO 2193	Deliberative	Draft talking points re: MIH - Anti-displacement strategies;MIH - Community opposition	NP	draft Q&A on Housing NY and MIH
344		NYCPRIVO 2200	Deliberative	Internal Memorandum re: Anti-displacement strategies;Community Opposition Strategies	NP	questions for agencies for purposes of HPD affordable housing planning
345		NYCPRIVO 1952	Legislative	Draft Document re: ENY - Anti-displacement strategies;ENY - City council input;Application of Community Preference	NP	Per City's Agreement
346		NYCPRIVO 1971	Attorney Client;Deliberative	Internal Memorandum re: Application of Community Preference	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
347		NYCPRIVO 2261	Deliberative;Legislative	Draft talking points re: Anti-displacement strategies	NP	document provided by CM Brad Landers about possible bill protecting tenants from harassment
348		NYCPRIVO 2283	Deliberative;Legislative	Draft Internal Memorandum re: Anti-displacement strategies	DPP	decision memo to mayor to guide decision re: Bedford Armory Project; DO NOT PRODUCE UNDER RODRIGUEZ
349		NYCPRIVO 2301	Attorney Client;Legislative	Email chain re: MIH - Community opposition	AC	Withdrawing legislative privilege; communications with counsel and others concerning response to request from CM regarding certain AMI units under MIH policy; reflects legal advice

350		NYCPRIVO 2037	Deliberative;Legislative	Draft Document re: ENY - Anti-displacement strategies;Application of Community Preference	NP	draft outline of issues to inform decisions re: East New York development
351		NYCPRIVO 2302	Deliberative;Legislative	Email chain re: Anti-displacement strategies; ENY - Anti-displacement strategies	DPP & Legislative	
352		NYCPRIVO 2040	Deliberative	Email chain re: MIH - Anti-displacement strategies	NP	communications re: state of the city address highlights as talking points to press
353		NYCPRIVO 2355	Attorney Client;Deliberative	Draft talking points re: 421-a - Homeless Preference	NP	Per City's Agreement
354		NYCPRIVO 2360	Deliberative	Email chain re: 421-a - Homeless Preference	NP	Per city's Agreement
355		NYCPRIVO 2362	Deliberative	Email chain re: Anti-displacement strategies	DPP	communication re: East Harlem Displacement number error in connection with preparing scope of work for RFP; PRODUCE UNDER RODRIGUEZ
356		NYCPRIVO 2063	Deliberative	Email chain re: Application of Community Preference	NP	communications re: albany housing agenda presentation and mayor's talk with Castro about CPP
357		NYCPRIVO 2066	Attorney Client;Deliberative;Work Product	Draft Internal Memorandum re: MIH - Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
358		NYCPRIVO 2393	Deliberative;Legislative	Draft talking points re: Anti-displacement strategies	DPP & Legislative	version of proposed bill advocated by Administration to prevent Tenant harassment; PRODUCE UNDER RODRIGUEZ
359		NYCPRIVO 2398	Attorney Client;Deliberative;Work Product	Draft presentation re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	AC & WP	draft of document analyzing settlement options
360		NYCPRIVO 3973	Attorney Client	Email chain re: Community Opposition Strategies	NP	Per City's Agreement

361		NYCPRIVO 2079	Attorney Client;Deliberative	Draft Internal Memorandum re: Commitment to Fair Housing	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
362		NYCPRIVO 2086	Deliberative	Draft talking points re: Application of Community Preference	NP	Per City's Agreement
363		NYCPRIVO 2087	Attorney Client;Deliberative	Draft Internal Memorandum re: Commitment to Fair Housing	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
364		NYCPRIVO 2088	Attorney Client;Deliberative	Draft Internal Memorandum re: Commitment to Fair Housing	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
365		NYCPRIVO 2412	Deliberative	Draft Document re: Anti-displacement strategies	NP	draft submission to receive an award for innovations in government - public engagement unit submission
366		NYCPRIVO 2487	Work Product	Internal Memorandum re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy
367		NYCPRIVO 2488	Work Product	Internal Memorandum re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy
368		NYCPRIVO 2490	Work Product	Notes re: Litigation - Winfield Litigation	WP	Analysis for informing litigation strategy
369		NYCPRIVO 2491	Deliberative;Work Product	Internal Memorandum re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP	technical notes for housing study for litigation
370		NYCPRIVO 2493	Deliberative;Work Product	Internal Memorandum re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP	technical notes for housing study for litigation
371		NYCPRIVO 2496	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	internal deliberations regarding analysis for litigation
372		NYCPRIVO 2497	Deliberative;Work Product	Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	NP	Per City's Agreement
373		NYCPRIVO 2498	Deliberative;Work Product	Draft presentation re: Litigation - Winfield Litigation;Housing Connect Data Analysis	NP	Per City's Agreement

374		NYCPRIVO 2501	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	NP	Per City's Agreement
375		NYCPRIVO 2502	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
376		NYCPRIVO 2504	Deliberative;Work Product	Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	NP	Per City's Agreement
377		NYCPRIVO 2506	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	Internal presentation of internal study of various data conducted to inform litigation strategy and settlement position in Winfield
378		NYCPRIVO 2507	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	NP	Per City's Agreement
379		NYCPRIVO 2508	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
380		NYCPRIVO 2510	Deliberative;Work Product	Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	NP	Per City's Agreement
381		NYCPRIVO 2511	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	Internal presentation of internal study of various data conducted to inform litigation strategy and settlement position in Winfield
382		NYCPRIVO 2513	Deliberative;Work Product	Draft presentation re: Litigation - Winfield Litigation;Housing Connect Data Analysis	NP	Per City's Agreement
383		NYCPRIVO 2515	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
384		NYCPRIVO 2526	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
385		NYCPRIVO 2527	Deliberative;Work Product	Draft presentation re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement

386		NYCPRIVO 2536	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
387		NYCPRIVO 2537	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
388		NYCPRIVO 2538	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
389		NYCPRIVO 2540	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
390		NYCPRIVO 2542	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
391		NYCPRIVO 2543	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
392		NYCPRIVO 2546	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
393		NYCPRIVO 2558	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
394		NYCPRIVO 2559	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
395		NYCPRIVO 2560	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
396		NYCPRIVO 2575	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
397		NYCPRIVO 2576	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
398		NYCPRIVO 2577	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement

399		NYCPRIVO 2578	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
400		NYCPRIVO 2579	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
401		NYCPRIVO 2580	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
402		NYCPRIVO 2581	Deliberative;Work Product	Draft Internal Memorandum re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
403		NYCPRIVO 2582	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
404		NYCPRIVO 2583	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
405		NYCPRIVO 2584	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
406		NYCPRIVO 2585	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
407		NYCPRIVO 2586	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
408		NYCPRIVO 2587	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
409		NYCPRIVO 3974	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
410		NYCPRIVO 2588	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement

411		NYCPRIVO 2589	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Application of Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
412		NYCPRIVO 2590	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
413		NYCPRIVO 2591	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
414		NYCPRIVO 2592	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
415		NYCPRIVO 2593	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
416		NYCPRIVO 2595	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
417		NYCPRIVO 2596	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
418		NYCPRIVO 2597	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
419		NYCPRIVO 2602	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
420		NYCPRIVO 2605	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
421		NYCPRIVO 2606	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
422		NYCPRIVO 2610	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
423		NYCPRIVO 2611	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
424		NYCPRIVO 2612	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement

425		NYCPRIVO 2613	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
426		NYCPRIVO 2614	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
427		NYCPRIVO 2615	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
428		NYCPRIVO 2617	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
429		NYCPRIVO 2619	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
430		NYCPRIVO 2620	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
431		NYCPRIVO 2621	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
432		NYCPRIVO 2622	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
433		NYCPRIVO 2655	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
434		NYCPRIVO 2656	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
435		NYCPRIVO 2657	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
436		NYCPRIVO 2658	Deliberative;Work Product	Draft Document re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
437		NYCPRIVO 2659	Deliberative;Work Product	Draft Document re: Litigation - Winfield Litigation;AFFH and Community Preference;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
438		NYCPRIVO 2660	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	framework for analysis to inform litigaton strategy and settlement
439		NYCPRIVO 2668	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement

440		NYCPRIVO 2669	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
441		NYCPRIVO 2670	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
442		NYCPRIVO 2671	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
443		NYCPRIVO 2672	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
444		NYCPRIVO 2673	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Analysis for informing litigation strategy
445		NYCPRIVO 2674	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
446		NYCPRIVO 2676	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
447		NYCPRIVO 2679	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Analysis for information litigation strategy
448		NYCPRIVO 2680	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy
449		NYCPRIVO 2681	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
450		NYCPRIVO 2682	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
451		NYCPRIVO 2686	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
452		NYCPRIVO 2687	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
453		NYCPRIVO 2692	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy
454		NYCPRIVO 2695	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
455		NYCPRIVO 2696	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
456		NYCPRIVO 2700	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
457		NYCPRIVO 2701	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
458		NYCPRIVO 2702	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement

459		NYCPRIVO 2703	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
460		NYCPRIVO 2704	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
461		NYCPRIVO 2746	Deliberative;Work Product	Internal Charts or Maps re: Anti-displacement strategies; Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
462		NYCPRIVO 2747	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;AFFH and Community Preference;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy
463		NYCPRIVO 2748	Deliberative	Internal Charts or Maps re: Litigation - Winfield Litigation;AFFH and Community Preference	WP	draft data analysis to inform litigation strategy and settlement
464		NYCPRIVO 2749	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP & DPP	analysis to inform litigation strategy and settlement
465		NYCPRIVO 2760	Deliberative	Final report (non-public) re: Application of Community Preference;Housing Connect Data Analysis	DPP	describes housing and neighborhood study conducted for purposes of evaluating impact of subsidized housing on health and well being and school performance; PRODUCE UNDER RODRIGUEZ
466		NYCPRIVO 2753	Work Product	Notes re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy
467		NYCPRIVO 2754	Work Product	Draft Document re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy; in anticipation of litigation; FOIL request from plaintiff's counsel
468		NYCPRIVO 3990	Work Product	Notes re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	created to respond to FOIL request made by Gurion
469		NYCPRIVO 2755	Work Product	Draft report re: Litigation - Winfield Litigation	WP	Analysis for informing litigation strategy
470		NYCPRIVO 2093	Attorney Client;Deliberative	Draft Internal Memorandum re: Commitment to Fair Housing	AC & DPP	decision memo to mayor re: MIH seeking/reflecting legal advice

471		NYCPRIVO 3991	Deliberative	Draft letter re: Anti-displacement strategies;421-a - Homeless Preference	NP	Draft letter from Mayor to constituents re: affordable housing
472		NYCPRIVO 3992	Attorney Client;Deliberative	Draft Internal Memorandum re: MIH - Anti-displacement strategies;Application of Community Preference	AC & DPP	draft decision memo to mayor re: creation of MIH program and seeking/reflecting legal advice
473		NYCPRIVO 3998	Deliberative	Draft report re: MIH - Anti-displacement strategies;Application of Community Preference	DPP	Decision memo to mayor re: how to engage with private applications subject to MIH at Barnett Ave.; DO NOT PRODUCE UNDER RODRIGUEZ
474		NYCPRIVO 4004	Deliberative	Final letter (non-public) re: MIH - Anti-displacement strategies;ENY - Anti-displacement strategies	NP	produce; same as 310
475		NYCPRIVO 4007	Deliberative	Draft talking points re: Anti-displacement strategies	NP	draft Q&As re: affordable housing in connection with 2015 mayor state of city address
476		NYCPRIVO 4016	Attorney Client	Draft report re: Anti-displacement strategies;ENY - Anti-displacement strategies	AC	communication from attorney summarizing thoughts and next steps on affordable housing in specific neighborhood
477		NYCPRIVO 4082	Attorney Client;Deliberative	Email chain re: Anti-displacement strategies;Commitment to Fair Housing	DPP	communication re: draft RFP for HRA program reflecting comments and revisions; DO NOT PRODUCE UNDER RODRIGUEZ
478		NYCPRIVO 4088	Attorney Client;Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	AC	attorney comments and revisions to anti-harassment tenant protection program RFP
479		NYCPRIVO 4089	Deliberative	Email chain re: Anti-displacement strategies	NP	communications re: draft press release for legal services for tenants
480		NYCPRIVO 4090	Attorney Client;Deliberative	Draft report re: Anti-displacement strategies;Commitment to Fair Housing	AC	attorney comments and revisions to anti-harassment tenant protection program RFP

481		NYCPRIVO 4107	Deliberative	Draft report re: Commitment to Fair Housing	AC	attorney comments and revisions to anti- harassment tenant protection program RFP
482		NYCPRIVO 4114	Deliberative	Draft talking points re: Anti- displacement strategies;Commitment to Fair HousingNP	NP	testimony of Jordan Dressler before NYC Council committee on 2017 budget
483		NYCPRIVO 2432	Work Product	Draft Internal Memorandum;Notes re: Anti-displacement strategies; Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP	Research for informing litigation strategy and settlement position
484		NYCPRIVO 2433	Deliberative;Work Product	Draft report;Internal Charts or Maps re: Litigation - Winfield Litigation;Application of Community Preference	WP & DPP	discussing settlement options in this case
485		NYCPRIVO 2434	Attorney Client;Deliberative	Email chain;Notes re: 421- a - Homeless Preference;Application of Community Preference	AC	Communication concerning topic for which legal advice is sought re: application of CPP a certain lottery applicant
486		NYCPRIVO 2436	Work Product	Draft report re: Litigation - Winfield Litigation	WP	Atty questions re: CPP and statistical tests
487		NYCPRIVO 2440	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
488		NYCPRIVO 2442	Deliberative;Work Product	Notes re: Litigation - Winfield Litigation	WP & DPP	notes discussing settlement options in this case
489		NYCPRIVO 2443	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation;Housing Connect Data Analysis	WP	Analysis for informing litigation strategy
490		NYCPRIVO 2444	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
491		NYCPRIVO 2445	Deliberative;Work Product	Draft report;Notes re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	notes discussing metrics for analysis in case

492		NYCPRIVO 2446	Deliberative;Work Product	Internal Charts or Maps re: Litigation - Anticipated Litigation re: Community Preference;Litigation - Winfield Litigation	WP & DPP	analysis to inform litigation strategy and settlement
493		NYCPRIVO 2447	Deliberative;Work Product	Draft report re: Litigation - Winfield Litigation	WP & DPP	description of studies about gentrification & displacement relevant to case analysis
494		NYCPRIVO 2449	Deliberative;Legislative	Notes re: 421-a - Homeless Preference	DPP	Internal working notes reflecting questions/considerations in determining implementation of certain preferences; DO NOT PRODUCE UNDER RODRIGUEZ
495		NYCPRIVO 2453	Deliberative	Draft talking points;Draft Document re: Anti- displacement strategies	NP	notes on draft talking points about Inwood Neighborhood study
496		NYCPRIVO 2454	Deliberative	Notes;Internal Memorandum re: Community Opposition Strategies	DPP	notes from neighborhood strategies team meeting about preserving housing; reflects internal discussions about policy strategies; DO NOT PRODUCE UNDER RODRIGUEZ
497		NYCPRIVO 4118	Deliberative	Notes re: Anti- displacement strategies	DPP	action steps and strategies related to homeless prevention policy; DO NOT PRODUCE UNDER RODRIGUEZ
498		NYCPRIVO 2481	Work Product	Internal Charts or Maps re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies
499		NYCPRIVO 2482	Attorney Client;Deliberative;Work Product	Notes;Draft Document re: Litigation - Winfield Litigation;Commitment to Fair Housing	NP	Per City's Agreement (except p. 5 which are attorney notes)
500		NYCPRIVO 2485	Work Product	Draft Document re: Litigation - Winfield Litigation	WP	Legal analysis and settlement strategies