

EXHIBIT 8

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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|---|---|-------------------------------|
| DANIEL GREER | : | CIVIL NO. 3:20-CV-00350 (JAM) |
| | : | |
| V. | : | |
| | : | |
| CONNECTICUT DEPARTMENT OF CORRECTION, ET AL. | : | MARCH 20, 2020 |

DECLARATION OF KAREN MARTUCCI

I, Karen Martucci, pursuant to 28 U.S.C. §1246, declare under the pains and penalties of perjury that:

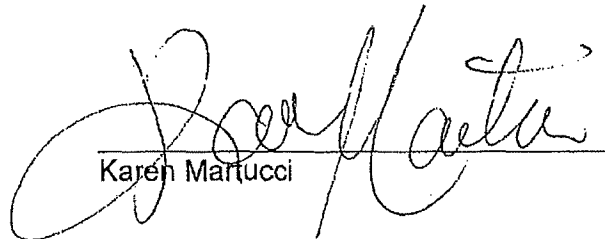
1. I am the Public Information Officer (PIO) for the Department of Correction (DOC). I have been employed by DOC for approximately 25 years, and have, among other positions, worked as a counselor and counselor supervisor, working as a unit manager at MacDougall-Walker CI, and in the facilities with inmates.
2. In my present role as PIO, I am part of the executive team that advises the Commissioner of Correction, and am responsible for carrying out his policies, including sharing his policies and press releases with the public.
3. In this role, I work with others in the DOC to publish on the DOC website on-going updates in response to the state of emergency and management of the COVID-19 pandemic. See <https://portal.ct.gov/DOC>
4. Our present Covid-19 protocols, which may change from day to day, include, but are not limited to those published on the DOC website.
5. For example, a copy of the March 12, 2020, Press Release found on the website is attached hereto, and can be found at:

<https://portal.ct.gov/-/media/DOC/Pdf/Coronavirus-3-20/Press-Release-Changes-due-to-Coronavirus-threat-3132020.pdf?la=en>.

6. The Department of Correction is continually reassessing the evolving situation and will provide updates when warranted. Additional information regarding the DOC's response to the Covid-19 outbreak can be found on the Health Information and Advisory page of the Department of Correction website: <https://portal.ct.gov/DOC/Common-Elements/Common-Elements/HealthInformation-and-Advisories>.
7. At present, DOC has implemented the Phase 1, Covid-19 Operational Response Plan. See <https://portal.ct.gov/-/media/DOC/Pdf/Coronavirus-3-20/Covid-19-Operational-Response-Plan.pdf?la=en>
8. Depending on the advice from Center for Disease (CDC), the Connecticut Department of Public Health (DPH), the Governor's Office and others, future Phases of the Covid-19 Operational plans may or may not allow for group activity, may require more social distancing, and the emergency situation is being evaluated daily to protect the health and safety of the inmate population and the staff, and the families of staff who work in the state's DOC facilities.

I have read the foregoing Declaration and declare under the penalty of perjury, pursuant to 28 U.S.C. § 1746, it is all true and accurate to the best of my knowledge and belief.

Date: March 20, 2020


Karen Martucci