

From: [HINSDALE86 Support](mailto:HINSDALE86%20Support@mycusthelp.net) on behalf of [HINSDALE86 Support <hinsdale86@mycusthelp.net>](mailto:HINSDALE86%20Support@mycusthelp.net)
To: ckoutava@hinsdale86.org; dkedrows@hinsdale86.org; tprentis@hinsdale86.org
Subject: [GovQA] New Request Assignment FYI - R000955-110821
Date: Monday, November 8, 2021 7:44:01 AM

This is a notification that Public Records Request / R000955-110821 has been assigned to your department. This email is provided for informational purposes.

Overview of the Request

Assigned Staff: Deb Kedrowski

Status: Received

Create Date: 11/8/2021 7:43:50 AM

Reference Number: R000955-110821

Requester: David Giuliani - david.giuliani@patch.com

Record(s) Requested:

I am seeking a security or other report of an incident that was believed to have happened outside one of the entrances of Hinsdale South High School after a Board of Education meeting on Oct. 28, 2021. Security may have been involved, and it may have happened at the south front entrance of the school. I am also seeking any video or emails related to the incident.

10/28/2021 - 11/08/2021

Request Due: 11/16/2021

Login to the system and view your issue by clicking [HERE](#).

This is an auto-generated email and has originated from an unmonitored email account. Please DO NOT REPLY



From: [Erik Held](#) on behalf of [Erik Held <eheld@hinsdale86.org>](#)
To: [Terri Walker](#); [Tammy Prentiss](#)
Subject: Fwd: Waters with Respect to Jeff Waters
Date: Friday, November 12, 2021 10:32:44 AM
Attachments: [01367793.PDF](#)

President Walker & Superintendent Prentiss-

Please proceed with the formal UGP complaint investigation.

Regards,

Erik M Held
D86 Board Of Education Member

----- Forwarded message -----

From: **Byrne, Larry** <lbyrne@pedersenhaupt.com>
Date: Fri, Nov 12, 2021, 10:22 AM
Subject: Waters with Respect to Jeff Waters
To: tprentis@hinsdale86.org <tprentis@hinsdale86.org>, twalker@hinsdale86.org <twalker@hinsdale86.org>, eheld@hinsdale86.org <eheld@hinsdale86.org>
Cc: Cody, Kayla <kcody@pedersenhaupt.com>

All:

Please see the attached.



Larry Byrne
Attorney at Law
161 North Clark Street, Suite 2700
Chicago, Illinois 60601
312-261-2155
lbyrne@pedersenhaupt.com

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Pedersen & Houpt

November 11, 2021

Lawrence W. Byrne

Attorney at Law

312 261 2155

Fax 312 261 1155

lbyrne@pedersenhaupt.com

Tammy Prentiss
Hinsdale Township High School
District 86
Hinsdale, IL 60521

Re: Records Retention Notice for Jeffrey Waters in relation to October 28, 2021 interaction between Mr. Jeffrey Waters and Erik Held

Dear Ms. Prentiss:

On October 29, 2021, you contacted Mr. Waters to discuss an incident that you allege to have occurred between Mr. Waters and Erik Held on October 28, 2021. I represent Jeffrey Waters with respect to the above referenced matter. Mr. Waters and I had an opportunity to review the tapes that represent the claims made either by Mr. Held or those communicated by you to Mr. Waters on October 29th, 2021. We believe the video footage demonstrates that Mr. Waters was not an aggressor towards Mr. Held, if anything the video footage would demonstrate that there was no actionable confrontation by Mr. Waters as Mr. Waters extricated himself from Held's presence. Held then used his vehicle to block Mr. Waters from leaving the parking lot. We believe that Mr. Held has made what may be defamatory statements as to my client and therefore we wish to have the video footage maintained. Additionally, we believe Mr. Held has contacted individual Board members to discuss this alleged incident, further publishing defamatory statements with respect to Mr. Waters.

Against that backdrop I am advising you that a Litigation Hold is demanded with respect to the video footage and any other electronically stored data ("ESD") as well as all Meta data associated with this matter as defined above (Collectively the "Relevant Information").

What You Must Do to Comply With This Notice

Please make sure that School District preserves the Relevant Information whether created or maintained in any form of medium by either Tammy Prentiss, Erik Held or Terri Walker, including any emails referencing the above incident sent or received, email, texts and instant messages; hard copies and electronic copies of documents or any cell phone used for personal or business purposes, other electronic notes, video recordings of alleged incident on October 28, 2021, audio or any other computer format that contain documents either including the video footage or referencing the video footage or any of Mr. Held's or your communicated claims referenced above. This includes all types of information such as email, both to and from any personal or business email account; text messages, backup video recordings, office and personal desktops

November 12, 2021

Page 2

and laptops (both in current use and legacy); cell phone records; and any other related information.

Information contained in electronic form must also be retained, including information on laptops, electronically stored information on personal and business devices and computer systems such as cell phones, tablets, video recordings, and other storage media.

The documents and data must be preserved in their "native" format (i.e., the format in which the documents and data are stored on the computer), including, but not limited to the "meta-data" (electronically stored information relating to the creation, modification and transmission of electronically stored documents and data).

Your failure to preserve the foregoing documents and information and/or if you ignore the directive of this "Preservation of Relevant Evidence Notice" could result in severe consequences, penalties, and sanctions against the School District and claims for spoliation of evidence.

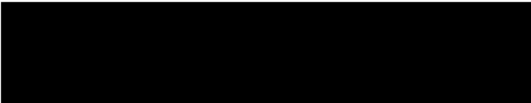
Until further notice, please search for, preserve and refrain from altering or destroying any video recordings, documents relating to the above topics for the time period of October 28, 2021, until this Preservation of Relevant Evidence Notice is rescinded in writing:

Please search for video footage/video recordings, documents, data and electronically stored information (whether in paper or electronic form) that potentially constitute Relevant Information, i.e., that fall within the categories identified above as "Documents To Be Preserved." No changes, additions, deletions, or amendments should be made to *any* of the documents listed in the above categories until you receive written notice that this "Litigation Hold" has been rescinded. Please clearly identify the location of these files, documents, and electronically stored information, and ensure that they are preserved "as-is." Please immediately halt all regularly scheduled policies and procedures for the destruction, archiving, or on- or off-line storage of Relevant Information.

Until further notice, you must retain all Relevant Information. If you are unsure whether or not to preserve a particular item of Relevant Information, please retain it and then check with me.

Please feel free to contact me with any questions or concerns you may have regarding the above

Sincerely,



Lawrence W. Byrne

cc: Jeffrey Waters