

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

EDWARD BRAGGS, et al.,)
)
Plaintiffs,)
)
v.)
)

CIVIL ACTION NO.
2:14-CV-

Defendants.)
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**PLAINTIFFS' FIRST AMENDED WITNESS AND EXHIBIT LISTS FOR
THE SUICIDE PREVENTION REMEDIAL TRIAL**

Plaintiffs hereby submit their First Amended Witness and Exhibit List for the Phase 2A suicide prevention remedial trial rescheduled to begin on Thursday March 28, 2019.

The Parties submitted witness and exhibit lists at 5:00pm on March 22, 2019. Plaintiffs reserved the right to amend their exhibit list to include any documents produced after the time of its filing. Doc. 2347. Plaintiffs also reserved the right to amend their witness list to include any witness whose testimony appears to be necessary in light of documents produced after the time of this filing.

In light of the Pretrial Hearing held on March 25, 2019 (Doc. 2441) and the rescheduling of the remedial trial on suicide prevention, Plaintiffs hereby amend their witness list.

Plaintiffs' expert Eldon Vail will testify by videoconference. Plaintiffs will make all necessary arrangements with the Clerk of Court's office.

I. WITNESS LIST

WITNESS	DATE	LENGTH	TOPICS
Dr. Edward Kern (will call)	March 28, 2019	5 hours	ADOC's Director of Psychiatry Dr. Kern will testify regarding efforts made to limit housing of persons with serious mental illness in segregation, ensure adherence to remedial regulations 3.8(i)-12(a)(1)-12.5 and 9-8.2(b) regarding,

WITNESS	DATE	LENGTH	TOPICS
Deborah Crook (will call)	March 29, 2019	3 hours	ADOC's Director of Mental Health Services Ms. Crook will testify regarding efforts made to limit housing of persons with serious mental illness in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Barbara Harris Coe (will call)	April 1, 2019	4 hours	Ms. Coe is Wexford's Mental Health Program Director. She will testify regarding efforts made to limit housing of persons with serious mental illness in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Jefferson Dunn (will call)	April 1, 2019	2 hours	ADOC Commissioner Dunn will testify regarding placements of high risk prisoners in segregation, and efforts made to limit housing of persons with serious mental illness in segregation, ensure the occurrence of security checks in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Deidra Wright (may call)	April 1, 2019	2 hours	Warden Wright is a Warden at Tutwiler Prison for Women. She will testify about the conditions in segregation and segregation-like units at Tutwiler and what, if any, action was taken following recent serious suicide attempts.
Christopher Gordy (will call)	April 2, 2019	6 hours	Warden Gordy is a Warden at Donaldson Correctional Facility. He will testify regarding the housing of persons with serious mental illness in segregation and segregation-like settings, and efforts made to ensure the occurrence of security checks in segregation and adherence to remedial orders.

Ruth Naglich (will call)	April 2-3, 2019	6 hours	ADOC Associate Commissioner of Health Services Naglich will testify regarding placements of high risk prisoners in segregation, and efforts made to limit housing of persons with serious mental illness in segregation, ensure the occurrence of security checks in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Eldon Vail (will call)	April 3, 2019, 1:00pm	3 hours	The Court recognized Mr. Vail as an expert in correctional administration in its Liability Opinion, overruling Defendants' Daubert objections. <i>Braggs v. Dunn</i> , 257 F. Supp. 3d 1171, 1186-88 (M.D. Ala. 2017); <i>see also Braggs v. Dunn</i> , No. 2:14-cv-601, 2017 WL 2984312 (M.D. Ala. July 13, 2017). As permitted by the Understaffing Order, Plaintiffs' expert Eldon Vail filed a response to the Defendants' staffing analysis on July 1, 2018. Doc. 1920-1. Mr. Vail will testify about the risks of and alternatives to placing people with serious mental illness and other high-risk individuals in segregation. Mr. Vail will also testify about ADOC's failure to employ practices that minimize the substantial risk of serious harm in segregation.

Dr. Kathryn Burns (will call)	April 8, 2019 10:00 a.m.	2 days	The Court has recognized Dr. Burns as an expert in this case and relied on her expert testimony in its liability opinion. <i>Braggs v. Dunn</i> , No. 2:14-cv-601, 2017 WL 2984312 at *3-4; <i>see also Braggs v. Dunn</i> , 257 F. Supp. 3d 1171 (M.D. Ala. 2017). She has since testified without objection from Defendants in the Understaffing, Segregation, and Residential Treatment Remedial Trials. Dr. Burns will testify about ADOC's practice of placing high-risk individuals in segregation. Dr. Burns will testify about the risks of and alternatives to placing people with serious mental illness and other high-risk individuals in segregation. Dr. Burns will also testify about ADOC's failure to employ practices that minimize the substantial risk of serious harm in segregation.
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Any witness identified by Defendants.

Any witness necessary for impeachment f 334.400.92 Tm ((i)0.5()2 019.52 245.68 395.5

	Suicides in ADOC	
P-1302	RFP 2017-02 – Comprehensive Inmate Healthcare Services	
P-1340	Position Classification Questionnaire	
P-1398	Administrative Regulation 433 Admin Seg	
P-1399	Administrative Regulation 434 Disciplinary Seg	
P-1488	B.T. Incident Report	ADOC0421089- ADOC0421092
P-1489	Billy Thornton Medical Records	ADOC0420708- ADOC0420860
P-1493	Robert Martinez Medical Records	ADOC0420968- ADOC0421074
P-1496	Robert Martinez Suicide Review	

P-1539

Suicide Watch Logs

	– June 2017	
P-1584	Suicide Watch Report – July 2017	
P-1585	Suicide Watch Report – August 2017	
P-1586	Suicide Watch Report – September 2017	

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P-1643	Jeffery Borden Medical Records	ADOC0424844- ADOC0425007
P-1646	Timothy Chumney Medical Records	ADOC0425008- ADOC0425131
P-1653	Paul Ford Medical Records	ADOC0425877- ADOC0425891
P-1654	Paul Ford Medical Records	ADOC0435025- ADOC0435112
P-1657	D.G. Medical Records, July-Oct. 2018	ADOC0425416- ADOC0425729
P-1669	Ben McClure Medical Records	ADOC0424783- ADOC0424843
P-1678	Billy Thornton Medical Records	ADOC0425183- ADOC0425223
P-1682	Suicide Watch Report - August, 2018	
P-1684	Suicide Watch Logs – August 16-31, 2018	
P-1685	Suicide Watch Report - September, 2018	
P-1686	Suicide Watch Logs – September 1-15, 2018	
P-1687	Suicide Watch Logs – September 16-30, 2018	
P-1688	Sept. 2018 Bibb Duty Post Logs	
P-1690	Bullock OP Group Logs / Sept.-Oct. 2018	ADOC0440332- ADOC0440343
P-1691	Easterling Group Logs / Sept.-Oct. 2018	ADOC0440344- ADOC0440356
P-1692	Elmore Group Logs / Sept.-Oct. 2018	ADOC0440357- ADOC044036
P-1693	Hamilton Group Logs / Sept.-Oct. 2018	ADOC0440362- ADOC0440379

P-1694	Kilby Group Logs / Sept.-Oct. 2018	ADOC0440380- ADOC0440383
P-1695	Limestone Group Logs / Sept.-Oct. 2018	ADOC0440384- ADOC0440386
P-1696	St Clair Group Logs / Sept.-Oct. 2018	ADOC0440387- ADOC0440394
P-1697	Staton Group Logs / Sept.-Oct. 2018	ADOC0440395- ADOC0440404
P-1698	Tutwiler Group Logs / Sept.-Oct. 2018	ADOC0440405- ADOC0440524
P-1699	Ventress Group Logs / Sept.-Oct. 2018	ADOC0440525- ADOC0440531
P-1721	Bullock Group Activity Rosters / Sept.-Oct. 2018	ADOC0441278- ADOC0441461
P-1722	Elmore Staton Group Activity Logs / Sept.- Oct. 2018	ADOC0441462- ADOC0441505
P-1725	IMAS Caseload Report (PDF)	ADOC0441628- ADOC0441690
P-1726	IMAS - SMI Report (EXCEL)	ADOC0441628- ADOC0441690
P-1728	Donaldson IP Group Logs / Sept.-Oct. 2018	ADOC0441730- ADOC0441814
P-1731	Bibb Group Logs / Sept.-Oct. 2018	ADOC0442125- ADOC0442126
P-1738	July 2018 Wexford Monthly Report	ADOC0439014- ADOC0439171
P-1748	Suicide Watch Logs – October 1-15, 2018	
P-1749	Oct. 30, 2018 Segregation Roster	ADOC0441580- ADOC0441627
P-1750	April 2018 Crisis Cell Utilization Logs	SPA_0076-SPA_0130; SPA_0216-SPA_0226; SPA_0381

P-1751	May 2018 Crisis Cell Utilization Logs	SPA_0388-SPA_0469; SPA_0363-SPA_0372
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P-1825	Ross Wolfinger - Officer Report - FCF- 18-01530 302-C	SPA_4477
P-1838	Bullock Restrictive Housing Unit Duty Post Logs / 9.30.18 – 10.6.18	ADOC0443029- ADOC0443121
P-1856	Donaldson Duty Post Logs V & W / 9.16.18- 10.5.18	ADOC0443421- ADOC0443597
P-1857	Donaldson Duty Post Logs I & J / 9.30.18- 10.5.18	ADOC0443598- ADOC0443709
P-1858	Donaldson Duty Post Logs I & J / 9.30.18- 10.5.18	ADOC0443710- ADOC0443820
P-1859	Donaldson Duty Post Logs RSTU / 9.28.18	ADOC0443821- ADOC0443920
P-1860	Donaldson Duty Post Logs RSTU / 9.16.18	ADOC0443921- ADOC0444117
P-1861	Donaldson Duty Post Logs X & Y / 10.3.18- 10.4.18	ADOC0444118- ADOC0444193
P-1862	Donaldson Duty Post Logs X & Y / 9.25.18	ADOC0444194- ADOC0444215
P-1864	Donaldson IP Group Rosters / Sept.-Oct. 2018	ADOC0444273- ADOC0444334
P-1870	Easterling Group Roster / Sept.-Oct. 2018	ADOC0444653- ADOC0444653
P-1871	Easterling Duty Post Logs Seg / 9.30.18- 10.6.18	ADOC0444654- ADOC0444730
P-1873	Easterling Group Roster / Sept.-Oct. 2018	ADOC0444734- ADOC0444735

P-1878	Fountain Duty Post Logs - Segregation / 9.30.18-10.7.18	ADOC0444755- ADOC0444819
P-1892	Holman Duty Post Logs – Seg. and Death Row/ 10.3.18-10.6.18	ADOC0444913- ADOC0444976
P-1893	Holman Duty Post Logs - Seg. and Death Row / 9.30.18-10.2.18	ADOC0444977- ADOC0445026
P-1899	Kilby Duty Post Logs N, O & P / 9.4.18- 10.7.18	ADOC0445095- ADOC0445428
P-1905	Limestone Duty Post Logs / 9.30.18-10.6.18	ADOC0445521- ADOC0445549
P-1914	St. Clair Duty Post Logs / 9.30.18-10.6.18	ADOC0445588- ADOC0445726
P-1933	Tutwiler Duty Post Logs D / 9.16.18- 10.6.18	ADOC0446031- ADOC0446137
P-1934	Tutwiler Duty Post Logs H / 9.16.18- 10.6.18	ADOC0446138- ADOC0446252
P-1935	Tutwiler Duty Post Logs L / 9.30.18- 10.6.18	ADOC0446253- ADOC0446301
P-1943	Ventress RH Prescreening, Assessments, Rounds Audit	ADOC0446358- ADOC0446360
P-1950	Donaldson MH Groups Logs / Sept.-Oct. 2018	ADOC0448090- ADOC0448097
P-1954	Easterling MH Group Logs / Sept.-Oct. 2018	ADOC0448342- ADOC0448343
P-1959	Holman MH Group Logs / Sept.-Oct. 2018	ADOC0448826- ADOC0448827
P-1965	SMI Flag Report - recent admits	ADOC0449378- ADOC0449417

P-1972	October 2018 Bibb Duty Post Logs	
P-1992	Suicide Watch Logs – October 16-31, 2018	

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P-2131	E-mail from Ruth Naglich to Barbara Coe, et al. re Question about SLU	ADOC0457328- ADOC0457329
P-2132	E-mail from Brandon Kinard to Barbara Coe re Holman Action Plan	ADOC0457330- ADOC0457332
P-2133	E-mail from Barbara Coe to Ruth Naglich, et al. re SMI Screening Clarification	ADOC0457333- ADOC0457336
P-2134	E-mail from Barbara Coe to Ruth Naglich, et al. re SMI Screening Clarification	ADOC0457337- ADOC0457339
P-2135	E-mail from Barbara Coe to Brandon Kinard, et al. re SMI Screening Clarification	ADOC0457340- ADOC0457346
P-2136	E-mail from Brandon Kinard to Barbara Coe re Spot Audit CAP	ADOC0457347- ADOC0457349
P-2137	E-mail from Brandon Kinard to Barbara Coe re Spot Audit CAP	ADOC0457350- ADOC0457355
P-2142	E-mail from Barbara Coe to Brandon Kinard, Ken Dover re Corrected Spot Audit CAP	ADOC0457373- ADOC0457375
P-2143	E-mail from Lynn Brown to Barbara Coe re SMI/RH stipulations Audit	ADOC0457376- ADOC0457378
P-2169	E-mail from Barbara Coe to Nanci Warren, et al. re CAPS	ADOC0458762- ADOC0458765

P-2236	Amended Phase 2A Interim Relief Order Regarding Suicide Prevention Measures	Doc. 1106
P-2237	Interim Agreement Regarding Suicide Prevention Measures	Doc. 1106-1
P-2238	Phase 2A Order and Injunction Regarding Bibb Segregation Remedy	Doc. 1751
P-2239	Stipulations Regarding Restrictive Housing Units at Bibb County Correctional Facility	Doc. 1748-1
P-2240	Phase 2A Order and Injunction on Serious Mental Illness Flag and Mental-Health Coding	Doc. 1792
P-2241	Stipulations Regarding Mental-Health Coding and Serious Mental Illness Implementation	Doc. 1792-1

P-2245	Stipulations Regarding Restrictive Housing Pre-Placement Screening, Mental-Health Rounds in Restrictive Housing and Periodic Mental-Health Assessments in Restrictive Housing	Doc. 1815-1
P-2246	Phase 2A Order and Injunction on Mental-Health Identification and Classification Remedy – Referrals	Doc.1821
P-2247	Stipulation Regarding Mental-	

P-2254	Stipulations Regarding Confidentiality	Doc. 1900-1
P-2256	Defendants' Proposed Segregation Remedial Plan	Doc. 1533
P-2257	Proposed Suicide Prevention and Crisis Care Remedial Plan	Doc. 1951
J-97	ADOC Administrative Regulation 607	
J-98	ADOC Administrative Regulation 608	
J-102	ADOC Administrative Regulation 611	
J-108	ADOC Administrative Regulation 614	

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Ex. No.	Title	Bates / Docket Number
P-2271	December 2018 and January 2019 Segregation Rosters	
P-2272	February 2019 Segregation Roster	
P-2273	Chart of Inmates with Serious Mental Illness in Restrictive Housing as of January 22, 2019	Doc. 2306
P-2274	Report on SMI Inmates in Restrictive Housing as of January 22, 2019 and Prior RHU Placements Since January 2018 for SMI Inmates in Restrictive Housing as of January 22, 2019	Doc. 2357
P-2275	Plaintiffs' Response to Defendants' Proposed Segregation Remedial Plan	Doc. 1546
P-2276	Plaintiffs' Response to Defendants' Suicide Prevention Plan	Doc. 1966
P-2277	Feb. 8, 2019 ADOC News Release	Doc. 2368-7
P-2278	Training: Suicide Risk Assessment, Prevention & Intervention	SPA_12931-SPA_13070
P-2279	Training: Suicide Prevention	SPA_11507-SPA_11535
P-2280	Wexford Mental Health Statistics and Supporting Documents, October 2018	SPA_12618-SPA_12797
P-2281	Wexford Mental Health Statistics and Supporting Documents, November 2018	SPA_12232-SPA_12517

Ex. No.	Title	Bates / Docket Number
P-2282	Wexford Mental Health Statistics and Supporting Documents, December 2018	SPA_111970-SPA_12231
P-2283	Timothy Chumney – MH004	SPA_9905-SPA_9907
P-2284	Timothy Chumney – Psychological Autopsy	SPA_10037-SPA_10043
P-2285	Jeffery Borden – MH004	SPA_10148-SPA_10151
P-2286	Jeffery Borden – Psychological Autopsy	SPA_10016-SPA_10022
P-2287	Ross Wolfinger – MH004, SEIR	SPA_10434-SPA_10437
P-2288	Ross Wolfinger – Psychological Autopsy	SPA_10030-SPA_10036
P-2289	John Barker – MH004, SEIR	SPA_10152-SPA_10158
P-2290	John Barker – Psychological Autopsy	SPA_10023-SPA_10029
P-2291	Mark Araujo – MH004, SEIR, Incident Report, Duty Officer Report, Medical Records	SPA_10205-SPA_10357
P-2292	Mark Araujo – SEIR, Mortality Review, Death Summary	SPA_10358-SPA_10362
P-2293	Mark Araujo – Psychological Autopsy	SPA_13151-SPA_13160
P-2294	Kendall Chatter – SEIR, MH004, Medical Records, Duty Officer Report	SPA_10159-SPA_10201
P-2295	Kendall Chatter – Duty Officer and Incident Reports	SPA_10442-SPA_10444
P-2296	Kendall Chatter – SEIR	SPA_10202

Ex. No.	Title	Bates / Docket Number
P-2297	Kendall Chatter – Psychological Autopsy	SPA_13161-SPA_13172
P-2298	Ryan Rust – Medical Records	

Ex. No.

Title

Bates / Docks / Doce

Ex. No.	Title	Bates / Docket Number
P-2335	D.H. – Movement History	ADOC0462727- ADOC0462728
P-2336	C.H. – Movement History	ADOC0462721- ADOC0462721
P-2337	F.J. – Movement History	ADOC0462741- ADOC0462744
P-2338	D.J. – Movement History	ADOC0462732- ADOC0462733
P-2339	Ben McClure – Movement History	ADOC0462716- ADOC0462716
P-2340	B.R.S. – Movement History	ADOC0462717- ADOC0462718
P-2341	B.S. – Movement History	ADOC0462720- ADOC0462720
P-2342	C.S. – Movement History	ADOC0462724- ADOC0462726

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Ex. No.	Title	Bates / Docket Number
P-2369	Ross Wolfinger – Movement History	ADOC0462898- ADOC0462899
P-2370	January 2019 Bibb - Crisis Cell Utilization	ADOC0462756- ADOC0462761
P-2371	January 2019 Bullock - Crisis Cell Utilization	ADOC0462769- ADOC0462776
P-2372	January 2019 and September 2018 Bullock - Crisis Cell Utilization	ADOC0462762- ADOC0462768
P-2373	January 2019 Donaldson - Crisis Cell Utilization	ADOC0462780- ADOC0462786
P-2374	January 2019 Easterling - Crisis Cell Utilization	ADOC0462787- ADOC0462792
P-2375	January 2019 and December 2018 Fountain - Crisis Cell Utilization	ADOC0462793- ADOC0462803
P-2376	January 2019 Hamilton A&I - Crisis Cell Utilization	ADOC0462804

Ex. No.	Title	Bates / Docket Number
P-2385	January 2019 Tutwiler - Crisis Cell Utilization	ADOC0462941-ADOC0462942
P-2386	January 2019 Staton - Crisis Cell Utilization	ADOC0462932-ADOC0462933
P-2387	January 2019 Staton - Crisis Cell Utilization	ADOC0462934-ADOC0462935
P-2388	January 2019 Tutwiler - Crisis Cell Utilization	ADOC0462936-ADOC0462938
P-2389	January 2019 Ventress - Crisis Cell Utilization	ADOC0462943-ADOC0462952
P-2390	Tutwiler Segregation Duty Post Log for L-Dorm / 2.12.19 – 2.15.19	ADOC0462953-ADOC0462978
P-2391	Tutwiler Segregation Duty Post Log for L-Dorm / 2.16.19-2.18.19	ADOC0462979-ADOC0463005
P-2392	October 2018 Wexford Monthly Client Report	SPA_10784-SPA_10922
P-2393	December 2018 Wexford Monthly Client Report	SPA_10473-SPA_10603
P-2394	November 2018 Wexford Monthly Client Report	SPA_10627-SPA_10783
P-2395	CAP-Suicide Prevention	SPA_10469-10472
P-2396	Suicide Watch Report – January 2019	
P-2397	Suicide Watch Logs – January 1-15, 2019	
P-2398	Suicide Watch Logs – January 16-31, 2019	
P-2399	Suicide Watch Logs – February 1-15, 2019	
P-2400	Crisis Cells and Overflow Cells Information	SPA_4478-4479

Ex. No.	Title	Bates / Docket Number
P-2401	Disciplinary Action – K.C.	SPA_13483-13484
P-2402	Disciplinary Action – K.C.	SPA_13485-13486
P-2403	Disciplinary Action – R.W.	SPA_13487-13489
P-2404	Incident Report – D.G.	SPA_13490-13491
P-2405	K.C. Medical Records	SPA_13492-13559
P-2406	Matthew Holmes - Duty Officer Report	SPA_13560
P-2407	Matthew Holmes - Incident Report	SPA_13561-13562
P-2408	Matthew Holmes – Medical Records	SPA_13563-13612
P-2409	Suicide Watch Report – November 2018	
P-2410	Suicide Watch Logs – November 16-30, 2018	
P-2411	Suicide Watch Report – December 2018	
P-2412	Suicide Watch Logs – December 1-15, 2018	
P-2413	Suicide Watch Logs – December 16-31, 2018	
P-2414	Suicide Watch Logs - February 1-15, 2017	
P-2415	Suicide Watch Logs - March 1-15, 2017	
P-2416	Suicide Watch Logs - May 1-15, 2017	
P-2417	Suicide Watch Logs - August 1-15, 2017	
P-2418	Suicide Watch Logs - September 1-15, 2017	

Ex. No.	Title	Bates / Docket Number
P-2419	January 2019 St. Clair Crisis Cell Utilization	ADOC0463006- ADOC0463008

P-2420

Ex. No.	Title	Bates / Docket Number
P-2452	Donaldson I&J Duty Post Logs / 2.16.19	ADOC0464184- ADOC0464186
P-2453	Donaldson I&J Duty Post Logs / 2.17.19	ADOC0464187- ADOC0464191
P-2454	Donaldson I&J Duty Post Logs / 2.13.19	ADOC0464192- ADOC0464195
P-2455	Donaldson I&J Duty Post Logs / 2.13.19	ADOC0464196- ADOC0464199
P-2456	Donaldson I&J Duty Post Logs / 2.14.19	ADOC0464200- ADOC0464202
P-2457	Donaldson I&J Duty Post Logs / 2.13.19	ADOC0464203- ADOC0464206
P-2458	Donaldson I&J Duty Post Logs / 2.14.19	ADOC0464207- ADOC0464211
P-2459	Donaldson RSTU Duty Post Logs / 2.1.19	ADOC0464212- ADOC0464216
P-2460	Donaldson RSTU Duty Post Logs / 2.2.19	ADOC0464217- ADOC0464220
P-2461	Donaldson RSTU Duty Post Logs / 2.3.19	ADOC0464221- ADOC0464223
P-2462	Donaldson RSTU Duty Post Logs / 2.6.19	ADOC0464224- ADOC0464229
P-2463	Donaldson RSTU Duty Post Logs / 2.12.19	ADOC0464230- ADOC0464235
P-2464	Donaldson RSTU Duty Post Logs / 2.13.19	ADOC0464236- ADOC0464241
P-2465	Donaldson RSTU Duty Post Logs / 2.15.19	ADOC0464242- ADOC0464245
P-2466	Donaldson RSTU Duty Post Logs / 2.16.19	ADOC0464246- ADOC0464249
P-2467	Donaldson RSTU Duty Post Logs / 2.17.19	ADOC0464250- ADOC0464255
P-2468	Donaldson RSTU Duty Post Logs / 2.1.19	ADOC0464256- ADOC0464259

Ex. No.	Title	Bates / Docket Number
P-2469	Donaldson RSTU Duty Post Logs / 2.2.19-2.3.19	ADOC0464260- ADOC0464263
P-2470	Donaldson RSTU Duty Post Logs / 2.3.19-2.4.19	ADOC0464264- ADOC0464267
P-2471	Donaldson RSTU Duty Post Logs / 2.6.19 – 2.7.19	ADOC0464268- ADOC0464272
P-2472	Donaldson RSTU Duty Post Logs / 2.12.19-2.13.19	ADOC0464273- ADOC0464277
P-2473	Donaldson RSTU Duty Post Logs / 2.15.19-2.16.19	ADOC0464278- ADOC0464282
P-2474	Donaldson RSTU Duty Post Logs / 2.16.19-2.17.19	ADOC0464283- ADOC0464286
P-2475	Donaldson RSTU Duty Post Logs / 2.17.19-2.18.19	ADOC0464287- ADOC0464290
P-2476	Donaldson RSTU Duty Post Logs / 1.31.19	ADOC0464291- ADOC0464296
P-2477	Donaldson RSTU Duty Post Logs / 2.4.19	ADOC0464297- ADOC0464301
P-2478	Donaldson RSTU Duty Post Logs / 2.5.19	ADOC0464302- ADOC0464307
P-2479	Donaldson RSTU Duty Post Logs / 2.14.19	ADOC0464308- ADOC0464312
P-2480	Donaldson RSTU Duty Post Logs / 2.18.19	ADOC0464313- ADOC0464318
P-2481	Donaldson RSTU Duty Post Logs / 1.31.19-2.1.19	ADOC0464319- ADOC0464322
P-2482	Donaldson RSTU Duty Post Logs / 1.31.19	ADOC0464323- ADOC0464326
P-2483	Donaldson RSTU Duty Post Logs / 2.5.19	ADOC0464327- ADOC0464330
P-2484	Donaldson RSTU Duty Post Logs / 2.13.19-2.14.19	ADOC0464331- ADOC0464334

Ex. No.	Title	Bates / Docket Number
P-2498	Donaldson V&W Duty Post Logs / 2.14.19	ADOC0464390- ADOC0464393
P-2499	Donaldson V&W Duty Post Logs / 2.18.19	ADOC0464394- ADOC0464397
P-2500	Donaldson X&Y Duty Post Logs / 2.17.19	ADOC0464398- ADOC0464403
P-2501	Donaldson X&Y Duty Post Logs/ 2.17.19	ADOC0464404- ADOC0464407
P-2502	Donaldson X&Y Duty Post Logs / 2.17.19	ADOC0464408- ADOC0464411
P-2503	Donaldson X&Y Duty Post Logs / 2.13.19	ADOC0464412- ADOC0464412
P-2504	Donaldson X&Y Duty Post Logs / 2.12.19	ADOC0464413- ADOC0464419
P-2505	Donaldson X&Y Duty Post Logs / 2.15.19	ADOC0464420- ADOC0464425
P-2506	Donaldson X&Y Duty Post Logs / 2.16.19	ADOC0464426- ADOC0464430
P-2507	Donaldson X&Y Duty Post Logs / 2.12.19	ADOC0464431- ADOC0464437
P-2508	Donaldson X&Y Duty Post Logs / 2.15.19	ADOC0464438- ADOC0464442
P-2509	Donaldson X&Y Duty Post Logs / 2.16.19	ADOC0464443- ADOC0464444
P-2510	Donaldson X&Y Duty Post Logs / 2.13.19	ADOC0464445- ADOC0464450

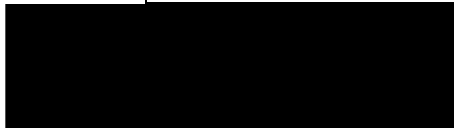
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P-2511	Donaldson X&Y Duty Post Logs / 2.13.19	ADOC0464451- ADOC0464457
P-2512	Donaldson X&Y Duty Post Logs / 2.18.19	ADOC0464458- ADOC0464462 Hamilton
P-2513	Hamilton Seg. .68 0.481 0.48	

Ex. No.	Title	Bates / Docket Number
P-2524	Donaldson Group Attendance Roster / Jan.- Feb. 2019	ADOC0464793- ADOC0464820
P-2525	Donaldson Group Attendance Roster / Jan.- Feb. 2019	ADOC0464821- ADOC0464833
P-2526	Donaldson RTU Group Log / Jan.-Feb. 2019	ADOC0464834- ADOC0464857
P-2527	Easterling Grief and Loss Group Roster / Feb. 2019	ADOC0464876- ADOC0464885
P-2528	Easterling Group Attendance Roster / Jan.- Feb. 2019	ADOC0464858- ADOC0464875
P-2529	Easterling Group Attendance Roster / Jan. 2019	ADOC0464886- ADOC0464903

P-2530

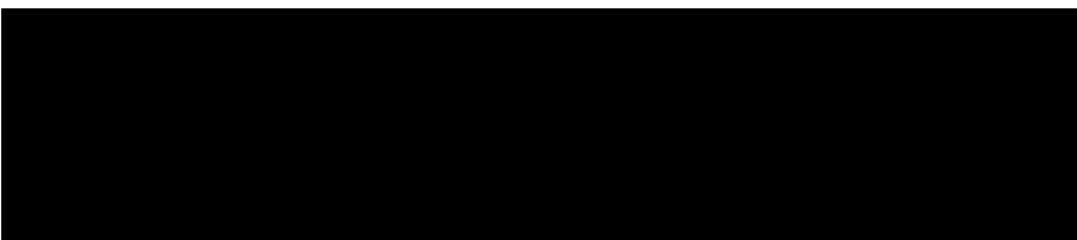
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Ex. No.	Title	Bates / Docket Number
P-2537	Limestone Group Attendance Roster/ Feb. 2019	ADOC0464941- ADOC0464984
P-2538	Limestone Group Attendance Roster / Feb. 2019	ADOC0464985- ADOC0464985
P-2539	Paul Ford Inst. File	ADOC0466061- ADOC0466175



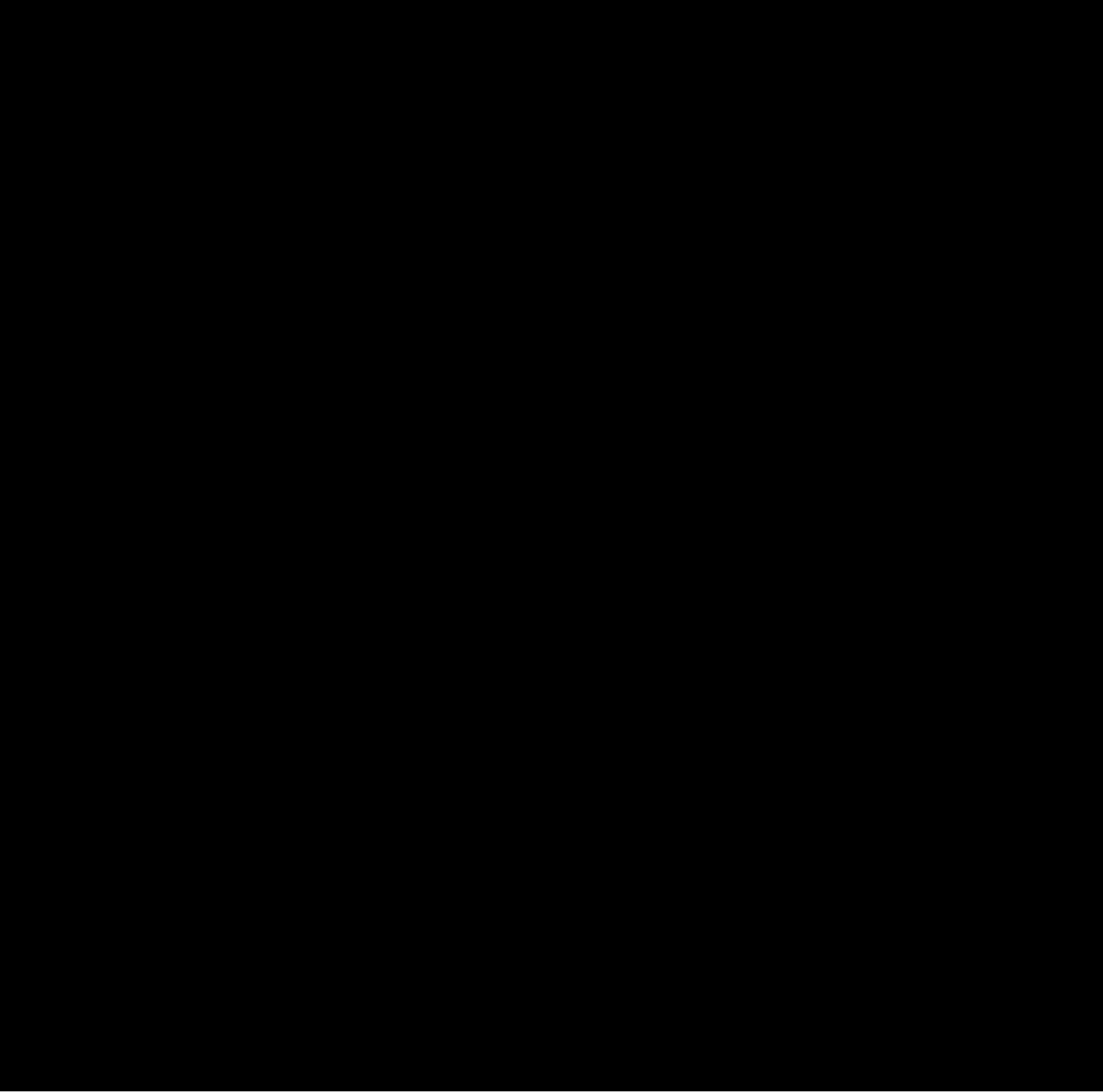
Q.M. Inst. File	ADOC0466176- ADOC0466379
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Ex. No.	Title	Bates / Docket Number
P-2550	Easterling Seg. Duty Post Logs / 2.18.19	ADOC0466977- ADOC0466993
P-2551	Fountain Seg. Duty Post Logs / 2.12.19-2.18.19	ADOC0466994- ADOC0467048 i 690.25



Ex. No.	Title	Bates / Docket Number
P-2563	Limestone Seg. Duty Post Logs / 2.8.19-2.14.19	ADOC0467522- ADOC0467561

P-25



Ex. No.	Title	Bates / Docket Number
P-2601	Tutwiler Seg. Duty Post Logs / 11.28.18-11.29.18	ADOC0468757- ADOC0468764
P-2602	Ross Wolfinger Inst. File	ADOC0468949- ADOC0469042
P-2603	Report and Recommendations on Suicide Prevention in the Alabama Department of Corrections	Doc. 2416-1
P-2604	Appendix - Suicide Record Reviews	Doc. 2416-2
P-2605	Sample Staff Referral Form	Doc. 2416-3
P-2606	Supplemental Recommendations on Suicide Prevention in the Alabama Department of Corrections	Doc. 2416-4
P-2607	September 2018 ADOC Monthly Statistical Report	
P-2608	November 2018 ADOC Monthly Statistical Report	Doc. 2418-2
P-2609	ADOC-Wexford MH CQI Presentation - JAB changes 2-22-19	SPA_13615-SPA_13629
P-2610	Advanced Suicide	

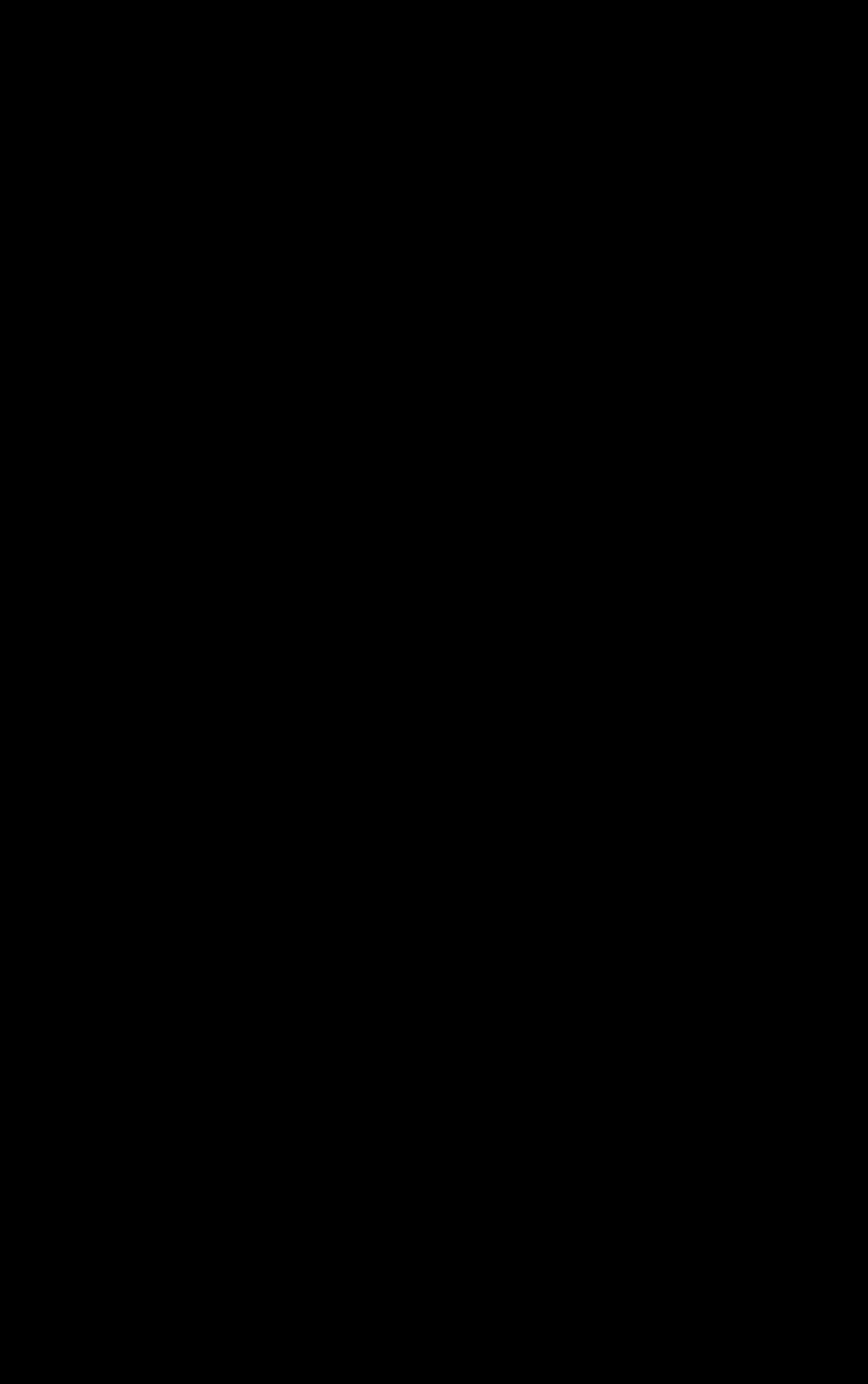
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Ex. No.	Title	Bates / Docket Number
P-2631	KILBY NOVEMBER Self-Audit	SPA_13699-SPA_13699
P-2632	Limestone - Suicide Prevention CAP	SPA_13700-SPA_13709
P-2633	LIMESTONE February Self-Audit	SPA_13710-SPA_13710
P-2634	LIMESTONE NOVEMBER Self-Audit	SPA_13711-SPA_13711
P-2635	Matthew Holmes - (SEIR)	SPA_13614-SPA_13614
P-2636	St. Clair February Self-Audit	SPA_13712-SPA_13712
P-2637	St. CLAIR NOVEMBER MH Self-Audit	SPA_13713-SPA_13713
P-2638	STATON-ELMORE February Self-Audit	SPA_13714-SPA_13714
P-2639	STATON-ELMORE NOVEMBER MH Self-Audit	SPA_13715-SPA_13715
P-2640	Suicide Prevention Measures Audit Tool FINAL	SPA_13716-SPA_13716
P-2641	Suicide Prevention Measures SELF-AUDIT STATEWIDE TOTALS	SPA_13717-SPA_13718
P-2642	Suicide Watch Tools v.02.27.2019	SPA_13719-SPA_13720
P-2643	TUTWILER February Self-Audit	SPA_13721-SPA_13721
P-2644	TUTWILER NOVEMBER MH Self-Audit	SPA_13722-SPA_13722
P-2645	VENTRESS NOVEMBER Self-Audit	SPA_13723-SPA_13723
P-2646	CO M.H. Written Reprimand	SPA_13724-SPA_13725

Ex. No.	Title	Bates / Docket Number
P-2647	Suicide Attempts	SPA_13726-SPA_13727
P-2648	February 2019 Suicide Prevention Report	
P-2649	February 16-28, 2019 Suicide Monitoring Logs	
P-2650	Phase 2A Order re Segregation Remedy	Doc. 1720
P-2651	Amended Stipulation Regarding Phase 2A Mental Health Consultation to the Disciplinary Process	Doc. 2384-1
P-2652	Administrative Regulation 403	Doc. 2384-2
P-2653	Amended Stipulation Regarding the Provision of Hospital-Level Care	

Ex. No. **Title**

Bates / Docket Number



Ex. No.	Title	Bates / Docket Number
P-2687	Tutwiler D Duty Post Logs 2.22.19-2.28.19	ADOC0472140- ADOC0472181
P-2688	Tutwiler RTU Duty Post Logs 2.22.19-3.1.19	ADOC0472182- ADOC0472213
P-2689	Tutwiler SU Duty Post Logs 2.22.19-3.1.19	ADOC0472214- ADOC0472268
P-2690	Joint Notice of Filing the Amended Stipulation Regarding the Provision of Hospital-Level Care	Doc. 2383

P-2691

Rashaud Morrissette

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Ex. No.	Title	Bates / Docket Number
P-2698	C.T. Institutional File	ADOC0473754- ADOC0475371
P-2699	C.T. Mental Health Records	ADOC0475372- ADOC0475403
P-2700	C.T. Inmate Movement History	ADOC0475404- ADOC0475405
P-2701	J.H. Medical Records	ADOC0475406- ADOC0475504

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 26th day of March, 2019, electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to the following:

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