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

EDWARD BRAGGS, et al.)
Plaintiffs,)))
V. JEFFERSON DUNN, in his official capacity as Commissioner of the Alabama Department of Corrections, et al.) CIVIL ACTION NO. 2:14-cv-00601-MHT-WC Judge Myron H. Thompson))))
Defendants.	,)

JOINT NOTICE OF AGREEMENT REGARDING PRODUCTIONS RELATING TO PEOPLE WITH SERIOUS MENTAL ILLNESS IN RESTRICTIVE HOUSING

The Parties hereby notify the Court of the following agreed document productions relating to people with serious mental illness in ctist ihousing:

- 1. [Starting November 1, 2019] Wexford will perform an audit of the ay-assessments contained in the RHU Order (doc. 18att546) to determine if the 7-day assessments are being timely and properly completed.
 - a. A random sampling of the day assessments for 10% of the inmates for whom 7-day assessments were completed systems will be forwarded to the Director of Psychiatry at Wexford Health Sources, Inc. or any

- Wexford regional office clinician(s) and quality assurance personnel designated by Wexford's Director of Psychiatry for this purpose on a monthly basis.
- b. The sampling of Aday assessments should include, but not be limited to, inmates in the RHU who are coded as ACH and not flagged as SMI.
- c. As part of its continuous quality improvement program, Wexford will review the 7day assessments using audit tools developed by Wexford and will develop any necessary corrective action plans.
- d. Wexford will report the results of its audit ofday assessmes and send the underlying 7day assessments to ADOC's Office of Health Services (OHS) on a quarterly basis. ADOC's OHS will review the report and underlying documents to determine whether any additional corrective action is necessary.
- e. If additional corective action is necessary, ADOC's OHS will request Wexford prepare and/or revise a corrective action plan and implement such plan.
- f. Plaintiffs' counsel will be provided Wexford's quarterly report, the underlying 7day assessments, ADOC's response to West audits, any further correspondence between ADOC and Wexford on the audits or

BAKER, DONELSON, BEARMAN, CALDWELL & BERKOWITZ PC 420 20th Street North, Suite 1400 Birmingham, AL 35203 Iborden@bakerdonelson.com wsomerville@bakerdonelson.com awalsh@bakerdonelson.com dnabors@bakerdonelson.com pclotfelter@bakerdonelson.com

/s/ Anil A. Mujumdar

Anil A. Mujumdar (ASB-2004-L65M)
One of the Attorney&or Plaintiffs
Alabama Disabilities Advocacy Program
2332 2nd Avenue North
Birmingham, AL 35203

Gregory M. Zarzaur, Esq. (ASB759E45Z) Anil A. Mujumdar, Esq. (ASB2004L65M) Denise Wiginton, Esq. (ASB905D27W) ZARZAUR 2332 2rd Avenue North Birmingham, AL 35203 Telephone: (205) 987985 Facsimile: (888) 50523 gregory@zarzaur.com anil@zarzaur.com denise@zarzaur.com

William Van Der Pol, Jr., Esq. (ASB112-114F)
Glenn N. Baxter, Esq. (ASB825-A41G)
Lonnie Williams, Esq.
Barbara A. Lawrence, Esq.
Andrea J. Mixson, Esq.
Ashley N. Austin, Esq. (ASB 059-F69L)
ALAB AMA DISABILITIES
ADVOCACY PROGRAM
Box 870395

Tuscaloosa, AL 35487
Telephone: (205) 348928
Facsimile: (205) 348909
wvanderpoljur@adap.ua.edu
gnbaxter@adap.ua.edu
lwilliams@aadap.ua.edu
blawrence@adap.ua.edu
amixson@adap.ua.edu
aaustin@adap.ua.edu

/s/ Matthew B. Reeves

Matthew B. Reeves

One of the Attorneys for the Commissioner and Associate Commissioner

William R. Lunsford
Matthew B. Reeves
Melissa K. Marler
Stephen C. Rogers
Alyson L. Smith
Melissa C. Neri
Maynard, Cooper & Gale, PC
655 Gallatin Street
Huntsv 0.48 4 ()Tj EMC /Pi

John G. Smith
David R. Boyd
BALCH & BINGHAM LLP
Post Office Box 78
Montgomery, AL 361010078
Telephone: (334) 836500
Facsimile: (866) 3169461
jgsmith@balch.com
dboyd@balch.com

Steven C. Corhern
BALCH & BINGHAM LLP
Post Office Box 306
Birmingham, AL 352040306
Telephone: (205) 258100
Facsimile: (205) 4855708
scorhern@balch.com

Gary L. Willford, Jr.
Joseph G. Stewart
Stephanie L. Smithee
ALABAMA DEPARTMENT OF CORRECTIONS
Legal Division
301 South Ripley Street
Montgomery, Alabama 36130
Telephone (334) 353884
Facsimile (334) 353891
gary.willford@doc.alabama.gov
joseph.stewart@doc.alabama.gov
stephanie.smithee@doc.alabama.gov