

APPENDIX H

Plaintiffs' Reply in Support of Motion for
Temporary Restraining Order and Preliminary
Injunction

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

WAYNE COUNTY JAIL INMATES, et. al.,

Case No. 71 173 217 CZ

Hon. Timothy M. Kenny

Plaintiffs,

v

WILLIAM LUCAS, et. al.,
Defendants.

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**PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION**

Defendants correctly state that “[t]he issue before this court is whether the delivery of health care (within the jail) is so bad that it amounts to a violation of the [Eighth] Amendment.” The answer to this question is simple: it is.

Thirteen detainees have filed sworn declarations with this Court, describing, in great detail, Defendants’ failure to take even the most basic precautions to mitigate the spread of COVID-19. The inspection report prepared by Fred Rottnek, M.D., MACHM independently confirms what these detainees have already explained: that three months after this pandemic began, Defendants are perpetuating dangerous conditions at the Wayne County Jail (the “Jail”) that put Plaintiffs’ lives at risk. And the **seventeen** sworn declarations attached to this Reply confirm that Defendants are *still* failing to undertake minimal measure to mitigate the transmission and spread of COVID-19 at the Jail.

Defendants argue that, because they have enacted policies and procedures, and because “no one solution is perfect,” they are absolved from any constitutional accountability. But as Plaintiffs’ declarations and Dr. Rottnek’s report demonstrate, the Jail continues to remain an unconscionably dangerous place where these policies and procedures are disregarded. Defendants have offered no evidence to the contrary.

Nowhere is Defendants’ deliberate indifference clearer than in Division II. Dr. Rottnek found that it is too dangerous to house detainees in Division II because it is impossible for detainees to socially distance or for the decrepit facility to be adequately cleaned. Defendants do not dispute this: they themselves concede that Division II should have been closed “well before the health crisis.” But even though Defendants are fully aware of these deplorable conditions, and despite having ample space in other facilities, they continue to confine detainees in Division II. The unconstitutional use of Division II to confine detainees during the pandemic is indisputably a

policy that is attributable to Defendants and was not addressed in the temporary stipulated order entered by this Court. This Court should therefore issue an order immediately requiring Defendants to discontinuing using Division II to confine detainees during the pandemic.

As to Plaintiffs' remaining requests for relief, Defendants correctly note that the parties have entered into a temporary stipulated order addressing some, but not all, of the relief sought. This does not, however, prohibit this Court from ordering the relief sought. First, the voluntarily entered stipulated order is temporary and expires in seven days on June 18, 2020. Absent an order from this Court, Defendants would be free to continue violating detainees' constitutional rights on June 19. More importantly, the declarations submitted with this Reply show that, notwithstanding the temporary order, Defendants continue to confine detainees in conditions that show an indifference to their health, lives, and constitutional rights.

Defendants' indifference for detainees' lives cannot be permitted to continue. This Court should order Defendants to immediately discontinue the use of Division II during the COVID-19 pandemic and reduce the Jail population to a level where social distancing is possible in Division I and III, including the floors in those facilities that are currently closed. This Court should also immediately enter the additional emergency relief Plaintiffs seek to ensure minimal health and hygiene safeguards are required beyond June 18, 2020.

UNDISPUTED FACTUAL BACKGROUND

A. COVID-19 Is A Deadly Infectious Disease That Is Spreading Rampantly Within the Wayne County Jail.

The overwhelming medical, scientific, and governmental consensus is that COVID-19 is a highly transmissible and deadly infectious disease. Defendants confine medically vulnerable people who are at heightened risk for serious complications or death in all three divisions at the Jail.

Defendants tested 689 detainees for COVID-19 between May 8, 2020 and May 11, 2020. Test results showed that 56 detainees actively had the virus (in total, 85 people have tested positive for the virus at the Jail, Defs. Br. at 9) and that 116 detainees tested positive for the antivirus, meaning that they were previously infected with the virus. Of the 111 detainees who tested positive for the virus, 90 were admitted to the jail before March 10, 2020, the day the first COVID-19 case was reported in Michigan. The test results, which provide a snapshot of the rate of infection at the Jail, show that 22 percent (146 out of 689) contracted COVID-19 while detained at the Jail. *See* Ex. 1 (Kim Decl.). Additionally, over 200 employees from the Wayne County Sheriff's Office have already tested positive, and four members of the Jail staff have already died as a result of being infected with the virus. Pls.' Br. at 1.

B. Confining Detainees in Division II Is Unsafe.

“Social distancing,” as defined by the Centers for Disease Control and Prevention (CDC) and by the medical experts in this case, is necessary to protect individuals from the serious risk of contracting and spreading COVID-19. Social distancing is the single most important measure anyone can take to reduce the transmission of COVID-19. If social distancing cannot be meaningfully practiced, then preventing the spread of infection is nearly impossible. Thoroughly cleaning and disinfecting high-touch surfaces and areas where people with confirmed or suspected COVID-19 cases spent time is also integral to stopping the spread and transmission of COVID-19, particularly in environments where consistent social distancing is difficult.

Social distancing is frankly not possible within Division II of the Jail. Dr. Fred Rottnek, the expert appointed by this Court, concluded that, “[i]n Division II, social distancing is impossible for inmates as well as for staff doing round[s].” Rottnek Report at 11; *id.* at 12. Dr. Rottnek further concluded that the physical condition of Division II renders thorough cleaning and disinfecting

impossible. *Id.* at 12 (“[T]he physical conditions are filthy and cannot be adequately cleaned due to pervasive disrepair, irregular surfaces, rust, paint peeling and chipping, mildew, and mold.”). Defendants concede that discussions to cease the use of Division II have been ongoing “well before the current health crisis.” Defs.’ Br. at 17. Defendants nevertheless insist that an infectious disease pandemic makes confining persons in these unsanitary conditions necessary.

A recent Jail population report showed that there are ample beds, across multiple floors that are currently closed, in Division III, the newest Jail facility. The 7th and 9th floors of the facility each have 128 available beds; the 7th floor annex has another 53 available beds; the 2nd floor has 86 available beds; and the 8th floor has 64 available beds. Thus, there are a total of 459 available beds across the closed floors in Division III. *See Ex. 2.*

C. Social Distancing Was Not Being Practiced When This Motion Was Filed and Was Not Being Practiced During Dr. Rottnek’s Inspection.

When this Motion was filed, Defendants were not providing adequate spacing of six feet or more so that social distancing could be accomplished. Detainees were being confined in cells approximately 8 feet by 15 feet that are shared by up to four other people, making it impossible for detainees to stay more than a few feet away from each other.¹ Detainees were required to eat meals at communal tables where social distancing could not be practiced.²

¹ Mathews Decl. ¶ 3 (The jail put me on a unit with 40 men, and it is almost impossible to be six feet away from anyone at any given time.”), ¶ 6 (“We sleep in four-person cubicles . . . and they are approximately 2 ½ - 3 ft away from each other.”); C. White Decl. ¶ 3 (“I slept in an 8 or 9 by 15 feet cubicle with three other men.”); Nickel Decl. ¶ 5 (“There are two women to every cell, and each cell has bunk beds.”); Kelly Decl. ¶ 17 (In the mental health rocks, “there are two beds and two people in each a cell.”).

² C. White Decl. ¶¶ 3 (“During meals, 4-5 men sit at each table. It is impossible to maintain a distance of six feet from another person.”); Mathews Decl. ¶ 8 (“During meals, all 40 men share a few tables. It is impossible to be six feet away from anyone during meals, and none of the guys wear masks when they’re eating.”); Pearson Decl. ¶ 6 (“We shared the same tables at meals”); Nickel Decl. ¶ 6 (“The unit with 10 women has three tables, and the 20 women unit has five tables. Everyone eats at those tables.”); Malec Decl. ¶ 5 (“[D]uring the day were all packed together into a common space with bad ventilation that makes it almost impossible to get six feet away from anyone at any given time.”); see also Kelly Decl. ¶ 6 (“ . . . I was physically touched or at a distance of less than six feet from approximately six officers.”)

D. Social Distance Was Not Being Practiced When Dr. Rottnek Conducted His Inspection.

In addition to the fact that social distancing remains impossible in Division II, Dr. Rottnek found that social distancing at the current jail population level in Division I is impossible because the jail cells have front-facing walls of bars or open steel grids, which allow large aerosolized droplets containing COVID-19 to spread freely between cells. Rottnek Report at 3, 4, 8.

Dr. Rottnek also found that Defendants continue to double-bunk detainees in beds that are only a few feet apart from each other. Rottnek Report at 8, 11-12. And in the medical unit, detainees with co-occurring health problems were kept on stretchers in close proximity to one another. *Id.* at 8.

Lastly, Dr. Rottnek observed that Jail staff were not practicing social distancing while at the Jail. *Id.* at 14 (observing Jail staff in a medical clinic “two feet apart, without wearing masks.”).

E. Defendants Did Not Post Signage at the Jail Warning Detainees of the Risk of COVID-19 Before This Motion Was Filed or Before Dr. Rottnek’s Inspection.

The CDC recommends that correctional facilities: (1) post signage throughout the facility communicating COVID-19 symptoms and hand hygiene instructions; (2) ensure such signage is understandable for non-English speaking people as well as those with low literacy; and (3) provide clear information about the presence of COVID-19 cases within a facility and the need to practice social distancing and maintain hygiene precautions.³

At the time this Motion was filed, the Jail provided detainees with little to no information about COVID-19. Specifically, the Jail failed to advise detainees of: the basic prevention guidance; the risks associated with infection, especially to certain vulnerable populations;

³ See *Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities*, CDC.gov (available at: <https://www.cdc.gov/coronavirus/2019-ncov/community/correction-detention/guidance-correctional-detention.html>).

symptoms; and available treatments.⁴ When detainees asked Jail staff for information, staff were dismissive, actively misled detainees, or falsely advised detainees that they were safer from infection inside the Jail.⁵

During his inspection, Dr. Rottnek found that the signage at the Jail *still* did not mention COVID-19 or discuss measures that must be taken to mitigate the spread of the virus. Rottnek Report at 14, 17. In Division I, Dr. Rottnek found that there was “limited and outdated” signage which did not mention COVID-19. *Id.* at 14. In Division II, the signage was “old and inaccurate” and made “no mention of COVID-19 or [the] definition of social/physical distancing.” *Id.* at 17. Further, although there were signs in Division III, they were outdated: “they had the old signs and symptoms—not the newer expanded signs and symptoms list by the CDC.” *Id.* at 20.

⁴ Matthews Decl. ¶ 10 (“The jail hasn’t told us anything about coronavirus.”); Kelly Decl. ¶ 10 (“ . . . the Jail staff didn’t mention anything about coronavirus.”); Carline Decl. ¶ 15 (“The Jail isn’t telling us anything about COVID. When I ask about COVID they dismiss what we have to say.”); Smelley Decl. ¶ 13 (In Division II, “[t]he jail hasn’t given us any information about COVID or hung any posters.”); Blanks Decl. ¶ 15 (“The Jail hasn’t given us any additional information about COVID-19, but a nurse posted a sheet of paper up that lists COVID-19 symptoms.”); Malec Decl. ¶ 3 (“The Jail hasn’t given us any information about COVID-19.”); Russell Decl. ¶ 13 (“They haven’t given us anything or any information [regarding COVID-19], there is nothing even posted on the pod.”); Pearson Decl. ¶ 16 (“We have not heard anything about COVID-19 from the jail staff.”); Velez Decl. ¶ 10 (“The Jail doesn’t tell us anything about COVID-19.”); Nickel Decl. ¶ 4 (“The jail never gave us any guidelines or information, verbally or in writing, about how to stay safe, how the virus is spread, or what symptoms we should look for.”).

⁵ Nickel Decl. ¶ 2 (“The general narrative from deputies was “you’re safer in here than you are out here.”), ¶ 4 (“I never received any information about Covid-19 from the jail staff until the last ten days that I was locked up. The jail turned the heat up really high one day, and one of the deputies told us that heat kills the virus”); H. White Decl. ¶ 12 (“I see coronavirus on TV and keep hearing someone in the kitchen died. When the guards hear something bad coming from the TV, they unplug it.”); Smelley Decl. ¶ 13 (“[The Jail] only tell us that we are in the best position in here because we haven’t been outside. Otherwise.”); Blanks Decl. ¶ 16 (“The Jail seems to be hiding what is going on.”).

F. Defendants Were Not Providing Detainees with Adequate Hygiene Products and Cleaning Supplies When This Motion Was Filed and During Dr. Rottnek’s Inspection.

When this Motion was filed, Detainees had limited access to hygiene supplies.⁶ Detainees also had limited or no access to cleaning supplies.⁷ Dr. Rottnek confirmed that, in many parts of the Jail, inmates *still* do not have adequate access to hygiene supplies to regularly wash their hands. Dr. Rottnek reported that, for Division I, Defendants provide detainees with only two or three hotel-sized bars of soap per week, which Plaintiffs must use to wash their clothes, hands, and bodies. Rottnek Report at 17 (Division II: “[i]nmates report that they were given 3 soaps every week or every 2 weeks. This is remarkably inadequate for regular hand washing and showering, particularly during a pandemic in which people are encouraged to frequently was[h] hands.”)

G. Defendants Were Not Adequately Cleaning and Sanitizing the Jail When This Motion Was Filed or During Dr. Rottnek’s Inspection.

When this Motion was filed, Defendants were not taking basic measures to maintain safe, hygienic conditions at the Jail. The bathrooms and showers the detainees shared were unsanitary,

⁶ Kelly Decl. ¶ 11 (“I only got one bar of soap for three days. It’s a hotel bar size . . . I asked multiple times for soap, but the jail wouldn’t give it to me.”); Carline Decl. ¶ 11 (In Division II, “[w]e’re given three hotel bars of soap per week to wash clothes, hands, bodies If we run out, we have to ask another inmate. The jail won’t give us more soap.”); Smelley Decl. ¶ 11 (same); Blanks Decl. ¶ 12 (same); Nickel Decl. ¶ 10 (same); Blanks Decl. ¶ 13 (I have only gotten one new uniform since I was transferred to Division II, and I have not received a new towel or new linens.”).

⁷ Matthews Decl. ¶ 7 (detainees only have access to Simple Green); Kelly Decl. ¶ 13 (“In quarantine we have no access to cleaning products.”), ¶ 16 (There is no hand sanitizer in mental health ward or in quarantine.”); Matthews Decl. ¶ 9 (“We don’t have access to any hand-sanitizer.”); Carline Decl. 11 (same); Smelley Decl. ¶ 9 (In Division II, [w]e don’t have any access to disinfectant of any kind.”); Nickel Decl. 13 (“We don’t have disinfectant to clean the tables or any other surfaces, such as the toilets, sinks, or showers.”); C. White Decl. ¶ 6 (“We do not have access to disinfectant of any kind.”); Carline ¶ 9 (“We only have access to cleaning supplies once in the morning.”), ¶ 10 (“All of the inmates share one tablet and one telephone. We don’t have any way to clean the tablet or phone after each use.”); Blanks Decl. ¶ 5 (In the quarantine unit, [e]ven though one of the guys in the unit was ill, we had no access to cleaning products.”); Russell Decl. ¶ 14 (“They won’t allow us to clean our rooms with [bleach], or even add it to the water that we mop with.”).

containing fecal matter, or often not even functioning.⁸ Cleaning of high-touch surfaces and areas was infrequent and insufficient.⁹

During Dr. Rottnek's inspection, Jail staff informed him that they were not able to sufficiently clean the Jail. Rottnek Report at 5 (Kitchen staff stated "'we can't clean like [they're] supposed to' because [they] used to have 25-28 trust[ies] for cleaning and now only [have] 2.'"), *id.* at 5 ("[Bathrooms] should be cleaned after each use," but some are cleaned only ". . . one/day by a trust[y].").

H. Jail Staff Were Consistently Failing to Wear Protective Equipment When This Motion was Filed and During Dr. Rottnek's Inspection.

At the time this Motion was filed, Jail staff fail were consistently failing to wear appropriate protective gear while inside the Jail.¹⁰ Dr. Rottnek observed that Jail staff was not wearing

⁸ Blanks Decl. ¶ 4 ("The sink in the first cell was unusable because the sink and toilet water were connected, and the sink water appeared to be tainted with fecal matter"); Nickel Decl. ¶ 10 ("most of the sinks were unusable" and "many of the sinks aren't completely in working condition . . . or [are] too dirty to use"), ¶ 11 ("The showers are filthy."); Carline Decl. ¶ 6 (sole shower was unusable for seven days); Russell Decl. ¶ 9 (five of the eight showers in pod do not work and four of the eight toilets are out of service); Pearson Decl. ¶ 18 ("The cell was disgusting . . . There was dried urine in the toilet. The whole cell smelled like urine. The toilet bowl is white but has turned orange because of the dried waste."). Some of the cell walls in Division I, at least, were covered with urine, feces, and vomit. Kelly Decl. ¶ 15 ("The walls are covered in feces, pee, and vomit. You can smell the toilets. They're filthy. The sinks are filthy. The walls are filthy.").

⁹ Matthews Decl. ¶ 7 ("40 guys share eight sinks, eight toilets, and eight showers. They are cleaned twice daily, regardless of how often they are used."), ¶ 8 (communal tables are wiped down only after meals); Kelly Decl. ¶ 10 ("[F]ive inmates, including myself, shared one shower. The shower is not cleaned after each use."), ¶ 13 ("In quarantine . . . I never saw anyone clean the showers or phone or any of the other common areas. . . ."), ¶ 18 (In the mental health rock, "[i]ve never seen [Jail staff] clean the shower."), ¶ 25 (On a different side of the mental health rock, [e]veryone shares one shower. I've never seen it cleaned. I never saw any disinfectant, and never saw anyone wipe it down.), ¶ 33 (In Division II, "[t]he cell bars are not cleaned."); Smelley Decl. ¶ 10 ("Jail staff comes in to clean the shower once a week or every other week. I have never seen the phone or tablet cleaned."); Blanks Decl. ¶ 5 (In the quarantine unit in Division I, "the Jail staff did not clean [at] any point."), ¶ 11 (In the quarantine unit in Division II, "[t]he unit has only been cleaned once in two weeks"); Hubbard Decl. ¶ 6 ("Every two weeks a corrections officer uses bleach to spray the bathroom."); Velez Decl. ¶ 9 ("I have never seen anybody clean with bleach or lysol or anything like that."); C. White Decl. ¶ 6 ("[N]o one cleans with disinfectant."), *id.* ("The tables are sprayed down with Simple Green after every meal, but the phones, tablets, bathrooms and everything else is cleaned with Simple Green once daily at the most.").

¹⁰ Matthews Decl. ¶ 11 ("The jail staff does not wear gloves, but some of them wear masks."); Kelly Decl. ¶ 6 (" . . . Some wore gloves and others wore nothing. But no one wore masks."), ¶ 7 (when serving food, Jail staff ". . . never wore gloves or masks when they did that."), ¶ 22 (In the mental health rock, [s]ome [Jail staff] were wearing protective wear. Others were not.), ¶ (In Division II, Jail staff "inconsistently wear masks and gloves. Sometimes one or the other, sometimes nothing, and sometimes both."); Carline ¶ 11 ("Some of the jail staff is wearing masks and gloves,

protective equipment during his inspection. Rottnek Report at 14 (observing two staff “sitting side by side, two feet apart, without wearing masks.”); *id.* at 6 (“There was inconsistent use of masks . . . among both inmates and staff.”).

I. The Distribution of Protective Equipment to Detainees Was Insufficient When This Motion Was Filed and During Dr. Rottnek’s Inspection.

The distribution of personal protective equipment (“PPE”) to Detainees was insufficient at the time this Motion was filed.¹¹ Distribution continues to be insufficient. Dr. Rottnek observed that “most of the masks I saw were fraying and/or visibly dirty.” Rottnek Report at 7; *id.* (“The two trustees I interviewed had visibly dirty and frayed masks.”) Detainees continued to report that they are given masks once every two weeks and by then, the mask is dirty and falling apart.” *Id.* at 15.

J. Defendants Were Failing to Provide Adequate and Timely Medical Care to Detainees When this Motion was Filed and During Dr. Rottnek’s Inspection

At the time this Motion was filed, the process for obtaining medical care, including COVID-19 testing for symptomatic detainees, was woefully deficient.¹²

but some are not.”), ¶ 18 (“The medical staff is wearing gloves and masks, but when they distribute medication, they use and reuse the same cups for multiple inmates.”); Smelley ¶ 8 (“Sometimes the deputies who serve food are not wearing masks and sometimes they are.”); Blanks Decl. ¶ 7 (Only one in three deputies responsible for serving food wore masks and gloves); Malec Decl. ¶ 10 (“The deputies hand out meals, which we eat in our cells. Some of them wear gloves and masks and some of them don’t.”); Pearson Decl. ¶ 8 (“The cooks do not wear face masks while they are making our food.”), ¶ 11 (“Some of the deputies don’t wear masks.”); C. White Decl. ¶ 9 (“The jail staff inconsistently wears masks. Some wear them and some don’t.”).

¹¹ Matthews Decl. ¶ 11 (“We got masks for the first time a couple of weeks ago. They are blue cloth. We haven’t received new masks since then.”); Smelley Decl. ¶ 7 (same); Kelly Decl. ¶ 6 (“ . . . I also did not have gloves or a mask.”); Nickel Decl. ¶ 8 (“I never received any gloves or a mask, and neither did any of the other inmates.”); Malec Decl. ¶ 7 (“The first time we ever got masks was on April 9. They are cloth masks like you see at the dentist office. They told us we have to use these for two weeks, and then after two weeks, we can get a clean one.”); Pearson Decl. ¶ 10 (“We were constantly asking for masks. Some of the guys have asthma and COPD.”), ¶ 11 (“When we finally got masks, we were told we had to keep them for two weeks.”); H. White Decl. ¶ 4 (“They gave us a paper mask that only gets changed every two weeks. The mask tears easily, it’s the cheapest mask you could ever wear.”).

¹² Malec Decl. ¶ 8 (“When I first started feeling sick, I complained to the guards, and they told me to tell a nurse. I told the nurse that I thought I had the virus. She asked if I had a fever, but she didn’t take my temperature and didn’t test me. She gave me Tylenol.”); Pearson Decl. ¶ 17 (“If anyone has any symptoms of the disease, they are given a Tylenol and sent back to the pod.”); Matthews Decl. ¶ 5 (“When I went to medical, they kept telling me they couldn’t really do anything, and that I had to see a doctor. No doctor was available.”); Smelley Decl. ¶ 3 (“Regular requests

At the time of his inspection, Dr. Rottnek found that “inmates reported being disincentivized by both medical and correctional staff to seek medical care for anything other than complaints related to coronavirus.” Rottnek Report at 9. Patients report delayed or ignored sick calls. Dr. Rottnek also found that several detainees reported “delayed and ignored requests for medical care,” *id.* at 10. Jail medical staff confirmed these findings: “When I asked [the nurse] if she thought they were adequately staffed in medical with COVID as well as chronic care and sick calls, she stated ‘Not really, to be honest, due to the shortage [of staffing].’” *Id.* at 5.

K. Defendants’ Policies

In March and April 2020, Defendants promulgated nine policies related to the COVID-19 pandemic. Defs.’ Ex. 2. Wellpath, Defendants’ contracted medical provider, also promulgated policies relating to medical care during the COVID-19 pandemic. Defs’ Ex. 3.

DEFENDANTS ARE STILL NOT TAKING THE NECESSARY STEPS TO MITIGATE THE TRANSMISSION OF COVID-19 IN THE JAIL¹³

In addition to the undisputed facts above, Plaintiffs submit seventeen recently sworn declarations with this Reply which shows that Defendants are still not taking the necessary precaution to mitigate the transmission of COVID-19 in the Jail.

for medical treatment take anywhere from two weeks to one month. And, that’s if we get any response at all. It’s not uncommon for the jail not to respond.”); Russell Decl. ¶¶ 2-5 (“I have not been taken to radiation treatments since being in the jail . . . I need my treatment really bad. If I don’t get it my cancer will probably spread.”); Hubbard Decl. ¶¶ 2, 17 (“I am diabetic and I have asthma. They are supposed to check my blood sugar at least one time per day. They’ve gone from testing once a day to once a week.”); Pearson Decl. ¶ 14 (“In order to get a medical appointment we have to fill out a request form, called a kite, [but the nurse] won’t give us the forms.”); H. White Decl. ¶ 7 (“I’ve been kiting to the doctors but I haven’t seen one yet. I send a kite every day. I don’t think the nurse turns them in because there is no doctor.”); ¶ 9 (“The only thing they give me is one ibuprofen and tell me to see a doctor but there isn’t one.”); ¶ 11 (“When I first got here I used to tell the deputies about my pain every day. They said if you aren’t dying, you’re not going to see a doctor.”); Velez Decl. ¶¶ 2-4 (Before testing positive for COVID-19, I consistently asked for medical treatment . . . In addition to telling the guards about how I didn’t feel well, I also filled out medical kite, and spoke to a nurse about how I felt. I said that I had shakes, that I was coughing, and that I didn’t have an appetite. In response, she gave me Tylenol, but she did not check my temperature, nor did she test me for COVID-19.); C. White Decl. ¶ 13 (“Recently, I requested medical care because my left arm was numb. I still haven’t seen a doctor. They only thing the jail did was give me Tylenol.”).

¹³ The Declarations referenced herein are attached to this Reply as Exhibit 3.

Defendants continue to confine detainees in cells and configurations where it is impossible to social distance. Detainees consistently express that it is extremely challenging to maintain six feet of distance in the jail facilities.¹⁴ It remains impossible to adequately practice social distancing in many parts of the Jail, including in common areas.¹⁵ In order to use the phones, tablets, and televisions inside the Jail, detainees must utilize the commons areas. In these spaces, there is no way to meaningfully socially distance.¹⁶

Detainees inside the jail do not have access to cleaning solutions that are necessary to sanitize the facilities they inhabit. Defendants are *still*—over six weeks since Plaintiffs’ complaint was filed in federal court—not providing adequate hygiene and cleaning products to detainees. Defendants are not providing enough soap for detainees to regularly and sufficiently wash their hands and bodies.¹⁷ Additionally, detainees are forced to use the soap that is already sparsely provided to *also* do their laundry. Although the Wayne County Jail is mandated to provide laundry

¹⁴ Long Decl. ¶ 8 (Our cells are closed with bars but the cells are so close together that you could reach through the bars and touch someone in the cell next to you.”); Campbell Decl. ¶ 7 (“The cells are very close together and if two people reached their hands through the bars, they could touch.”). This consistent inability to socially distance increases the likelihood of transmission of COVID-19.

¹⁵ Long Decl. ¶ 7 (“It is really hard to social distance in here.”); During meal times detainees are seated in close proximity to one another. [Laws Declaration – needs to be finalized] In some units the tables and chairs are bolted to the floor making it impossible to create space between other detainees dining in the same close space. Campbell Decl. ¶ 9 (It is impossible to socially distance yourself in here . . . We are always right next to each other when eating meals.”); Cochran ¶ 10 (“[In E-1] [i]t was jam-packed. It was like 60 of us in the open pod. There wasn’t no social distancing. It was dangerous.”); Johnson Decl. ¶ 8 (“It is impossible to social distance in here. There are only a few tables in our unit so every time we eat, we all sit right next to each other.”).

¹⁶Card Decl. ¶ 8 (“We are two and a half feet apart in the common area and we are together all day, every day. There is no way to social-distance.”); Long Decl. ¶ 7 (“I can usually only get about one or two feet away from the person sitting or standing next to me.”); Lynn Decl. ¶ 6 (“We have one T.V. where all 14 of us stand huddled around to watch the news and other programs...We have to stand close to each other to watch the TV because if it’s too loud, the guards will cut it off.”).

¹⁷ Long Decl. ¶ 6 (We are given three bars of soap that are tiny for the entire week.”); Campbell Decl. ¶ 8 (“We are given soap to clean ourselves with once a week, three little bars”); Card Decl. ¶ 12 (“We only get one roll of tissue paper and three small bars of soap per week.”); Lynn Decl. ¶ 13 (“We get three little bars of soap per week.”); Johnson Decl. ¶ 7 (“Once a week I am given three tiny bars of soap.”).

service per this Court’s consent decree, many detainees must use the few resources they can access to launder their own undergarments if they want it done with any reasonable frequency.¹⁸

Further, Defendants are *still* failing to provide detainees with adequate and effective cleaning agents.¹⁹ Detainees are forced to use battered and deteriorating tools to try and cleanse their living spaces.²⁰ The lack of useful cleaning instruments make it extremely challenging, if not impossible, to consistently main hygienic living spaces. This problem is further compounded by the fact that Defendants are *still* not adequately cleaning high-touch areas and surfaces in the facility.²¹

¹⁸ Lynn Decl. ¶ 13 (“We also have to use that soap to wash our underclothes...we have to use the soap to wash our underclothes or else we have to buy detergent from the commissary.”); Campbell Decl. ¶ 5 (“To wash our clothes we aren’t given any laundry soap.”); Card Decl. ¶ 10 (“We have to wash our laundry by hand when we get in the shower. We don’t get anything to help clean our sheets and laundry.”).

¹⁹ Long Decl. ¶ 3 (The mop bucket comes three times a week. “It looks like it’s mainly water.”); Campbell Decl. ¶ 3 (“The guards bring the bucket of cleaning supplies every morning but there aren’t any disinfectants . . . There used to be cleaning solution in the bucket but it ran out and hasn’t been replaced.”); Cochran ¶ 7 (“After I was sick, I cleaned my bunk with Simple Green, but that was all I could do.”), ¶ 9 (“We never have bleach or Lysol or anything like that.”); Anthony Decl. ¶ 6 (“You know this place is dirty, and we don’t have access to bleach. We have access to Simple Green.”); Card Decl. ¶ 11 (“We are always asking the guards for cleaning supplies. But we don’t get enough of them.”); Edwards Decl. ¶ 3 (“It was up to us to clean, but we weren’t given any cleaning supplies.”), ¶¶ 18-20. There is an absence of disinfectants that would be more effective at sanitizing the jail. Edwards Decl. ¶ 17 (“We have been asking for bleach. Every time they say no.”).

²⁰ Lynn Decl. ¶ 8 (“We share one broom and one mop with some solution in it. They give us a spray bottle every once in a while, with a cleaning solution in it.”); Johnson Decl. ¶ 4 (“The guards bring a cleaning bucket in the mornings but it only has a broom and a mop in it. The mop is never washed so it stinks.”). Detainees must frequently resort to re-purposing toilet paper as a cleaning tool. Edwards Decl. ¶ 18 (“You have to use your one roll of toilet paper to wipe down your table, bars, etc.”). Lynn Decl. ¶ 14 (We are given one roll of toilet paper a week which we have to use to clean surfaces as well as use the bathroom. When you run out, the guards won’t give you a new roll.”).

²¹ Long Decl. ¶ 4 (“The common areas are cleaned once about once a week by us, but only if we get the cleaning solution All ten of us on the unit share one shower. It is normally cleaned once a week but I can’t remember the last time it was actually cleaned.”); Byrant Decl. ¶ 14 (Jail staff did not clean Michael Meschinski’s room after he was released from the Jail; he died of COVID-19 shortly after being released.); Campbell Decl. ¶ 4 (“There is one phone in our unit for ten people to share. This phone doesn’t ever get cleaned. Our common areas are cleaned about once a month by certain guards.”); Campbell Decl. ¶ 8 (“The shower is supposed to be cleaned every week but it is really more like every nine days. The single shower in our unit is shared by the ten of us.”); Anthony Decl. ¶ 5 (“It’s nasty as hell in here. Nothing gets wiped down. It’s messed up. Showers are nasty. I’ve seen mold in the showers, and they don’t have nothing to clean that with.”); Card Decl. ¶ 9 (“The 10 of us share the same shower. The trustees used to come once a week to clean the shower with bleach.”); Edwards Decl. ¶ 3 (“The deputies don’t have anybody come in and clean anything in the quarantine unit.”); Lynn Decl. ¶ 9 (“When the coronavirus happened, they said they would spray the bars and cells regularly but I can’t remember the last time they sprayed the bars down.”); Johnson Decl. ¶ 6 (“I don’t see them clean the common areas or the things we touch often, like the phones.”).

Defendants are still not providing detainees with adequate supply of protective gear.²² This failure to provide sufficient PPE impedes any attempt by detainees to protect against illness inside the jail facilities. And Jail staff continue to fail to wear protective gear in the facility.²³

Medical care remains inadequate.²⁴ Defendants are not immediately testing detainees who present COVID-19 symptoms. Defendant are not immediately testing detainees who come in close contact with a person who has symptom of or a confirmed case of COVID-19.²⁵ Defendants have not given detainees the results of their COVID-19 tests.²⁶ This failure to provide adequate medical care perpetuates fear and anxiety amongst detainees, many of whom remain extremely susceptible

²² Long Dec. ¶ 4 (“We have not been given any protective gear other than three masks over the last few months.”); Card Decl. ¶ 15 (“They only give us disposable masks twice a month. They don’t help us clean it.”); Lynn Decl. ¶ 15 (same); Johnson Decl. ¶ 3 (same); Crothers ¶ 5 (They’re five-hour masks, but we only get new masks every two weeks.”).

²³ Long Decl. ¶ 11 (“When the guards don’t wear their masks, we ask them why but they just say to stop hollering.”); Bryant Decl. ¶ 12 (Jail staff “openly don’t wear the mask.”); Campbell Decl. ¶ 12 (“One time, when we asked a guard where his mask was, he said that he had adapted to the coronavirus because he had already been sick with it.”); Anthony Decl. ¶ 7 (“The sheriffs walk around with no masks.”); Johnson Decl. ¶ 8 (“But when the guards serve us food, only some of them wear both masks and gloves.”); Crothers Decl. ¶ 2 (“Some of them keep their masks around their chin instead of their face.”).

²⁴ Cochran Decl. ¶ ¶ 2-6; Edwards Decl. ¶¶ 13-14 (It took a week get a COVID-19 test after telling nurse about flu symptoms).

²⁵ Lynn Decl. ¶ 4 (There was actually a man in our unit who ended up testing positive for the virus who was walking around and talking to everybody. Once he tested positive, we all asked to get re-tested but they refused.”).

²⁶ Long Decl. ¶ 2; Bryant Decl. ¶ 17 (same); Campbell Decl. ¶ 2 (same); Cochran Decl. ¶ 13 (same); Card Decl. ¶ 4 (same); Johnson Decl. ¶ 2 (same); Crothers Decl. ¶ 10 (same).

to illness.²⁷ And Jail staff continues to take retaliatory actions against Detainees that endanger their safety and lives.²⁸

ARGUMENT

I. PLAINTIFFS ARE LIKELY TO SUCCEED ON THE MERITS OF THEIR EIGHTH AMENDMENT CLAIMS

Defendants have a constitutional obligation to protect incarcerated people from a substantial risk of serious harm. *Farmer v. Brennan*, 511 U.S. 825, 828 (1994). Under the Eighth Amendment, prison officials “must provide humane conditions of confinement; . . . must ensure that inmates receive adequate . . . medical care, and must take reasonable measures to guarantee the safety of the inmates[.]” *Id.* at 832 (internal quotation marks omitted). This obligation requires corrections officials to address prisoners’ serious medical needs—including needs far less dire than those at stake here.²⁹

This constitutional obligation requires Defendants to protect incarcerated people from the risk of “infectious maladies” and “serious contagious diseases” rather than waiting until someone tests positive to provide treatment. *Helling v. McKinney*, 509 U.S. 25, 33–34 (1993). Indeed,

²⁷ Long Decl. ¶ 9 (“I’ve put in three kites in the last month or so and when I tried to ask why they weren’t being responded to, the nurse said that they weren’t taking any patients because of COVID-19.”); Bryant Decl. ¶ 3 (“The deputies kept denying me medical treatment because there were no doctors.”), ¶ 5 (“Two months ago . . . I filled out a kite to see one but they still haven’t taken me to see one.”), ¶ 6 (“I’m allergic to citric acid. It took them about a month just to give me my dietary tray.”); Campbell Decl. ¶ 13 (“I’ve put in kites for medical treatment but they are not taking them.”); Cochran Decl. ¶ 11 (“I have high blood pressure. It took them over a month to prescribe my high blood pressure medicine.”); Card Decl. ¶ 2 (“I have hypertension, high cholesterol, and respiratory problems. But I cannot go to medical to attend to my personal health issues. No one responded to my medical kites.”); Edwards Decl. ¶ 10; Lynn Decl. ¶ 4 (“I have not seen a KITE nurse since I came to this unit.”); Johnson Decl. ¶ 10 (“Kites are ignored.”).

²⁸ Bryant Decl. ¶ 15 (after a detainee swore at deputy, the deputy made 40 detainees go into a small gym, where they were standing no more than two feet apart); Campbell Decl. ¶ 11 (“Whenever we ask about COVID-19, the guards get mad at us and threaten to lock us down.”). Many detainees live in the constant fear of will be punished related to COVID-19

²⁹ See *Plata, Brown v. Plata*, 563 U.S. 493, 531-32 (U.S. 2011); *Helling*, 509 U.S. at 35; *Estelle v. Gamble*, 429 U.S. 97, 104 (1976); *Flanory v. Bonn*, 604 F.3d 249, 255 (6th Cir. 2010) (extended failure to provide toothpaste); *Talal v. White*, 403 F.3d 423, 427 (6th Cir. 2005) (exposure to tobacco smoke).

“[i]t would be odd to deny an injunction to inmates who plainly proved an unsafe, life-threatening condition in their prison on the ground that nothing yet had happened to them.” *Id.*; see also *Farmer*, 511 U.S. at 833 (“having stripped [detainees] of virtually every means of self-protection and foreclosed their access to outside aid, the government and its officials are not free to let the state of nature take its course”).

Eighth Amendment claims require a showing of “deliberate indifference” to a substantial risk of serious harm. *Farmer*, 511 U.S. at 828. “Deliberate indifference has two components to it: objective and subjective.” *Villegas v. Metro. Govt. of Nashville*, 709 F.3d 563, 568 (6th Cir. 2013).³⁰ Deliberate indifference may be “infer[red] from circumstantial evidence,” including “the very fact that the risk was obvious.” *Farmer*, 511 U.S. at 842. Courts in Michigan and elsewhere have found that jail officials demonstrate deliberate indifference when they confine persons in conditions that do not prevent the spread of COVID-19.³¹

As explained below, the undisputed record evidence in this case demonstrates that Defendants have been and continue to remain deliberately indifferent to the serious risks posed by COVID-19. Defendants do not refute the most serious allegations in Plaintiffs’ Motion: that the inability to socially distance in, and adequately clean, Division II makes it impossible to mitigate the spread of COVID-19 at the Jail, and thus, that detainees should not be confined there during

³⁰ Defendants’ assertion that “[d]eliberate indifference claims are the same under the Eighth and Fourteenth Amendments,” Def. Br. at 15, relies entirely on outdated case law preceding *Kingsley v. Hendrickson*, 576 U.S. 389 (2015). Since *Kingsley*, the Sixth Circuit has recognized that pre-trial detainees, whose terms of confinement are governed by the Fourteenth Amendment, may no longer need to demonstrate the subjective component of the deliberate indifference standard in order to show that their conditions of confinement are unconstitutional. See *Hopper v. Phil Plummer*, 887 F.3d 744, 752 (6th Cir.), *reh’g denied* (May 1, 2018); *Richmond v. Huq*, 885 F.3d 928, 938 n.3 (6th Cir. 2018). In any event, Plaintiffs meet both standards as explained herein.

³¹ See, e.g., *Cameron v. Bouchard*, — F. Supp. 3d —, 2020 WL 2569868, at *20-25 (E.D. Mich. May 21, 2020); *Wilson v. Williams*, — F. Supp. 3d —, 2020 WL 1940882, at *8 (N.D. Ohio Apr. 22, 2020); *Fofana v. Albence*, — F. Supp. 3d —, 2020 WL 1873307, at *8 (E.D. Mich. Apr. 15, 2020); *Malam v. Adducci*, — F. Supp. 3d —, 2020 WL 1672662, at *12 (E.D. Mich. Apr. 5, 2020); *Thakker v. Doll*, — F. Supp. 3d —, 2020 WL 1671563, at *8 n.15 (M.D. Pa. Mar. 31, 2020).

the pandemic, if ever, at all. Pls.’ Br. at 4. Indeed, Defendants effectively concede that Division II *should* have been closed “well before the current health crisis.” Defs.’ Br. at 17. Yet despite the availability of over 400 beds in closed floors in other Jail facilities, Defendants insist that COVID-19 makes confining persons in Division II necessary. The continued use of Division is by itself sufficient to establish Defendants’ deliberate indifference. Beyond the decrepit and dangerous conditions specific to Division II, the general conditions of confinement at the Jail on May 4, 2020, when this Plaintiffs’ complaint was initially filed in federal court, and during Dr. Rottnek’s inspection, further establish Defendants’ deliberate indifference. Immediate action by this Court to protect the health and safety of Detainees is urgently needed.

A. Defendants’ Use of Division II to Confine Detainees During the Pandemic Constitutes Deliberate Indifference to Detainees’ Constitutional Rights.

Defendants’ continued use of Division II to confine Detainees during the pandemic constitutes deliberate indifference to the serious risk that detainees may contract COVID-19.

As set forth above, due process requires that persons confined prior to trial be protected from conditions that “pose an unreasonable risk of serious damage to . . . future health.” *Helling*, 509 U.S. at 35. *Helling* holds that the Constitution forbids jailing people when “the risk . . . is not one that today’s society chooses to tolerate.” *Id.* at 36. Longstanding precedent applies these principles to a serious risk of infectious disease. *See, e.g., Gates v. Collier*, 501 F.2d 1291, 1300-03 (5th Cir. 1974). In order to succeed on an Eighth Amendment claim, Plaintiffs must show that Defendants were objectively and subjectively “deliberately indifferent” to a substantial risk of serious harm. *Farmer*, 511 U.S. at 828; *Villegas v. Metro. Govt. of Nashville*, 709 F.3d 563, 568 (6th Cir. 2013).

There is no dispute that the objective prong of the deliberate indifference test has been satisfied here. To satisfy the objective component, detainees must demonstrate that they are

“incarcerated under conditions posing a substantial risk of serious harm.” *Farmer*, 511 U.S. at 834; *see also Richko v. Wayne Cty.*, 819 F.3d 907, 915 (6th Cir. 2016) (quoting *Amick v. Ohio Dep’t of Rehab. & Corr.*, 521 F. App’x 354, 361 (6th Cir. 2013)) (explaining that a plaintiff satisfies “the objective component by showing that, ‘absent reasonable precautions, an inmate is exposed to a substantial risk of serious harm’”). Defendants do not dispute that the objective component is satisfied. The record shows that COVID-19 is a highly transmissible and deadly disease. The congregate nature of the Jail—where hundreds of persons share sinks, toilets, and showers, as well as eating, sleeping, and living spaces—makes it an unfortunately ideal environment for the spread of COVID-19. *See, e.g., Cameron v. Bouchard*, 2020 WL 2569868, at *21 (E.D. Mich., 2020) (citing cases)³².

The subjective component is also satisfied. “To satisfy the subjective component, the plaintiff must allege facts which, if true, would show that the official being sued subjectively perceived facts from which to infer substantial risk to the prisoner, that he did in fact draw the inference and then disregarded that risk.” *Comstock*, 273 F.3d at 703 (citing *Farmer*, 511 U.S. at 834). Defendants do not—and cannot—dispute that COVID-19 poses a grave risk the detainees. Defendants disregard that risk by failing to take reasonable measures to abate it. *Farmer*, 511 U.S. at 847. The overwhelming medical and scientific consensus is that social distancing of at least six feet is required to reduce the risk of transmission of COVID-19.³³ Medical and scientific

³² The Sixth Circuit motions panel’s stay of *Cameron*, pending appeal, does not abrogate *Cameron*, as decisions of motions panels are not binding. *See Wallace v. FedEx Corp.*, 764 F.3d 571, 583 (6th Cir. 2014).

³³ *See, e.g., Social Distancing: Keep Your Distance to Slow the Spread*, CDC.gov (available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>).

consensus also require that high-touch surfaces and areas in a facility be routinely cleaned and disinfected in order to reduce the risk and spread and transmission of COVID-19.³⁴

Defendants do not dispute that neither of these critical steps can be taken in Division II. They do not dispute Dr. Rottnek's conclusion that "[i]n Division II, social distancing is impossible for inmates as well as for staff doing rounds." Rottnek Report at 11; *id.* at 12. And they do not dispute that the decrepit physical condition of Division II renders thorough cleaning and disinfecting impossible. *Id.* at 12 ("[t]he physical conditions are filthy and cannot be adequately cleaned due to pervasive disrepair, irregular surfaces, rust, paint peeling and chipping, mildew, and mold.").

In fact, Defendants concede that not only should detainees not be housed in Division II during the current pandemic, but that Division II should have been closed "well before the current health crisis." Defs.' Br. at 17.³⁵ There could not be stronger evidence of deliberate indifference at this stage in the litigation. Defendants have unmistakably "turned the kind of blind eye and deaf ear to a known problem that would indicate total unconcern for the [detainees'] welfare." Defs.' Br. at 16 (citing *Money v. Pritzker*, — F. Supp. 3d —, 2020 WL 1820660, at *18 (N.D. Ill. Apr. 10, 2020)).

Defendants attempt to defend their actions, arguing that "ceasing to house inmates at Division II amidst this pandemic would only create for greater difficult [sic] in spacing of inmates." Defs.' Br. at 18. But a recent Jail population report showed that there are ample beds, across

³⁴ See, e.g., *Cleaning and Disinfection for Households*, CDC.gov (available at: <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cleaning-disinfection.html>).

³⁵ Wayne County Jail Sheriff Robert Dunlap has publicly noted the decrepit conditions in Division II. See *Claims of 'inhumane' conditions fuel bid for new Wayne County jail*, The Detroit News (June 6, 2018), <https://www.detroitnews.com/story/news/local/wayne-county/2018/06/06/claims-inhumane-conditions-fuel-bid-new-wayne-county-jail/653117002/> ("It doesn't afford inmates the level of decency that a human being should have").

multiple floors that are currently closed, in Division III, the newest Jail facility. Indeed, there are over 450 beds available across the closed floors in Division III alone. Defendants do not mention this fact in their brief, let alone explain why these facilities are not being used to confine detainees, in lieu of confining them in Division II. Judge Linda V. Parker of the Eastern District of Michigan very recently found that Oakland County was deliberately indifferent for continuing to house detainees in dangerous conditions, where, *inter alia*, social distancing was not possible, even though “many of the Jail’s housing cells remain empty”:

And despite their understanding of the risk associated with the close quarters in which inmates reside, as of May 1, almost half of the Jail’s population was housed in multi-person cells, with a significant number in housing units with more than 10 individuals. At the same time, many of the Jail’s housing cells remain empty. The fact that Defendants offer no explanation regarding why individuals have not been moved to these available cells in order to maximize the distance between inmates suggests a disregard of the substantial risk of contracting a virus that already has been demonstrated to be lethal.

Cameron, 2020 WL 2569868, at *23.

Even if Defendants could not use other facilities to confine inmates during the pandemic, the Constitution would require them to reduce the jail population to a level that did not necessitate the use of Division II. In *Brown v. Plata*, the Supreme Court confirmed that if the prison conditions are such that a population reduction is the only way to cure a constitutional violation, then the Constitution requires a reduction in the prison population. 563 U.S. 493, 521, 526–29 (2011) (noting that prisoner release order was appropriate because adequate care was “impossible” without a reduction). Defendants’ failure to either utilize ample existing, constitutionally adequate facilities or to reduce the Jail population to a level where all detainees are housed in constitutionally adequate conditions constitutes deliberate indifference. An order requiring Defendants to immediately discontinue using Division II during the pandemic is warranted and necessary.

B. The Undisputed Findings in Dr. Rottnek’s Report Establishes Defendants’ Deliberate Indifference

In addition to Defendants’ continued unconstitutional use of Division II to confine detainees, *see pp. 3-4, supra*, Defendants’ deliberate indifference as to detainees’ wellbeing during this pandemic is evident from the undisputed fact that, at the time of Dr. Rottnek’s inspection, Defendants were *still* failing to follow basic health and safety measure recommended by the CDC to mitigate the spread of the COVID-19. The CDC Guidelines were promulgated on March 23, 2020. The *Russell* Plaintiffs filed their lawsuit in federal court on May 4, 2020, alleging that Defendants were unconstitutionally indifferent by failing to take basic measures to mitigate the transmission of COVID-19. In the interim, thousands of news stories and reports documenting the severity of COVID-19 were published, and state and local governments undertook significant shutdown measures that have drastically affected the economy and transformed our society. Despite these warnings—and despite *notice* that Dr. Rottnek would be conducting an inspection—Defendants *still* failed to take basic health and safety precautions when the inspection occurred. This constitutes deliberate indifference.

For example, Dr. Rottnek found that Defendants were failing to implement one of the simplest measures necessary to mitigate the risk of spreading COVID-19: posting accessible signs containing critical pandemic-related information. The CDC recommends that correctional facilities “post signage throughout the facility communicating COVID-19 symptoms and hand hygiene instructions, ensure such signage is understandable for non-English speaking people as well as those with low literacy, and provide clear information about the presence of COVID-19 cases within a facility and the need to increase social distancing and maintain hygiene

precautions.”³⁶ On May 4, 2020, the *Russell* plaintiffs alleged that Defendants were failing to provide detainees with information about COVID-19, including posting signs about necessary precautions and the importance of social and physical distancing. *See supra* p. 6. Despite ample notice of the necessity of signage—in addition to what one would hope to be common sense—Dr. Rottnek found that, in Division I, there was “limited and outdated” signage which did not even mention COVID-19. *Id.* at 14. In Division II, the signage was “old and inaccurate” and made “no mention of COVID-19 or [the] definition of social/physical distancing.” *Id.* at 17. And although there were signs in Division III, they were outdated: “they had the old signs and symptoms—not the newer expanded signs and symptoms list by the CDC.” *Id.* at 20. Defendants’ failure to comply with the CDC’s *most basic* recommendation, despite having notice of this deficiency, constitutes deliberate indifference. *See Farmer*, 511 U.S. at 842.

Dr. Rottnek also found that Defendants were failing to implement one of the most *critical*—not to mention one of the most widely accepted and understood—measures necessary to mitigate the risk of transmission of COVID-19: social distancing. Here, again, even though the CDC guidelines, countless publications and reports, and the allegations in *Russell* put Defendants on notice of the need to ensure adequate social distancing at the Jail, Defendants nevertheless continued to confine detainees in conditions where social distancing was not possible. Two weeks after *Russell* was filed, Dr. Rottnek found that Defendants were confining detainees in conditions where social distancing was impracticable and was otherwise not being practiced. Dr. Rottnek found that social distancing at the current jail population level in Division I is impossible because the jail cells have front-facing walls of bars or open steel grids, which allow large aerosolized droplets containing COVID-19 to spread freely between cells. Rottnek Report at 3, 4, 8. Dr.

³⁶ *See* note 3, *supra*.

Rottnek also found that Defendants continue to double-bunk detainees in beds that are only a few feet apart from each other. Rottnek Report at 8, 11-12. And in the medical unit, detainees with co-occurring health problems kept on stretches in close proximity to one another. *Id.* at 8. Even worse, Dr. Rottnek observed that Jail staff were not practicing social distancing while at the Jail. *Id.* at 14 (observing Jail staff in a medical clinic “two feet apart, without wearing masks.”). Defendants do not dispute any of these facts in their brief.

Worse yet, the *seventeen* sworn and mutually corroborating detainee declarations filed with this Reply further demonstrate that Defendants are *still* failing to follow basic health and safety measure recommended by the CDC to mitigate the spread of the COVID-19. *See Ex. 3.*

The failure to implement these necessary, obvious precautions after the filing of a class action lawsuit alleging dangerous and unconstitutional conditions of confinement further demonstrates Defendants’ deliberate indifference. In a case seeking only prospective relief, even if Defendants only learn about the “objectively intolerable risk of serious injury” from the Complaint, an ongoing refusal to cease confining individuals in the face of that immitigable risk is “deliberately indifferent.” *See Farmer v. Brennan*, 511 U.S. 825, 846 n.9 (1994); *Helling*, 509 U.S. at 36 (“[T]he subjective factor . . . should be determined in light of the prison authorities’ *current* attitudes and conduct.” (emphasis added)). Any other rule would not make sense. As a federal district court in another COVID-related case noted, “the status quo of a mere few weeks ago no longer applies. Our world has been altered with lightning speed, and the results are both unprecedented and ghastly The choice we now make must reflect this new reality.” *Thakker*, 2020 WL 1671563. The court thus held that, even though the conditions in the local federal detention facilities were not insufficient because of intent or malice, “should we fail to afford

relief” to medically vulnerable prisoners, “we will be a party to an unconscionable and possibly barbaric result.” *Id.*

As discussed below, Defendants are also failing to enforce and follow the policies that they claim to have put in place to address the COVID-19 pandemic. In *Phillips v. Roane Cty., Tenn.*, the Sixth Circuit recognized longstanding precedent that officials’ failure to comply with their own policies establishes deliberative indifference. 534 F.3d 531, 541 (6th Cir. 2008) (concluding that the officials’ failure to comply with the protocols and transport the inmate to the medical center, for over two weeks, demonstrated deliberate indifference. In a recent Sixth Circuit case addressing the conditions of confinement in Jails during the COVID-19 pandemic, the court relied on *Phillips* in finding that a federal prison had not been deliberately indifferent to the health and lives of detainees under their custody because it had complied with a five-phased national directive, including updating the directives and protocol, and trained staff on the directives. *Wilson* at 5, 14, 18. Conversely, Defendants have failed to comply even with their own policies to address COVID-19, in addition to not implementing other minimally necessary policies, *see p. 24, infra*. Defendants are deliberately indifferent.

II. PLAINTIFFS ARE LIKELY TO SUCCEED ON THEIR *MONELL* CLAIMS

The Supreme Court has held that a municipality or other local government is liable under 42 U.S.C. § 1983 when action pursuant to official municipal policy causes injury. *Monell v. New York City Dept. of Soc. Servs.*, 436 U.S. 658, 694 (1978); *Richmond*, 885 F.3d at 948. Plaintiffs are incarcerated in the Jail, so Wayne County is responsible for ensuring that Plaintiffs are protected from and not exposed to the Jail-wide substantial risks posed by COVID-19. *See Helling*, 509 U.S. at 32 (quoting *DeShaney v. Winnebago County Dept. of Social Services*, 489 U.S. 189, 199–200 (1989)).

Plaintiffs allege that Defendants continue to confine detainees in Division II in violation of the Eighth Amendment, despite their awareness that social distancing in the facility is not possible, and that the conditions of disrepair make it impossible to clean the facility such that the risk of transmission of COVID-19 can reasonably be mitigated. Plaintiffs also allege that Defendants are failing to take minimal necessary hygiene and safety precautions (such as posting signs, as discussed, p. 6, *supra*) necessary to mitigate the spread of the virus. These alleged unconstitutional policies are directly attributable to Defendants.

Defendants' *Monell* arguments rest largely on two flawed grounds. First, they argue that highly generalized policies show that they were taking some measures to mitigate the spread of COVID-19 at the Jail when this Motion was filed, and therefore Plaintiffs' *thirteen* sworn declarations and Dr. Rottnek's corroborating report do not establish that Plaintiffs are likely to succeed on their *Monell* claims. This is wrong.

The unconstitutional use of Division II to confine detainees during the pandemic is a policy directly attributable to Defendants, and therefore, Plaintiffs are likely to succeed on their *Monell* claim. Further, as discussed below, Defendants' written policies do not address or otherwise discuss the Jail-wide allegations in Plaintiffs' sworn declarations and in Dr. Rottnek's report. Plaintiffs' evidence therefore demonstrates that they are likely to prevail on their *Monell* claim. For example, the inability to provide conditions that allow for adequate social distancing, the failure to post signage communicating the risk of COVID-19, the failure to provide sufficient hygiene products suffices to show a "direct causal link between [the County's] action and the deprivation of federal rights." *Gregory v. Shelby Cty.*, 220 F.3d 433, 442 (6th Cir. 2000).

Even where Defendants' policies do address Plaintiffs' allegations, they do not put forward specific and detailed evidence demonstrating that these policies are being carried out as

written. Plaintiffs' overwhelming evidence therefore establishes that Defendants are likely failing to train and supervise staff in deliberate indifference to Plaintiffs' constitutional rights. *City of Canton, Ohio v. Harris*, 489 U.S. at 388 (1989) (“ . . . failure to train amounts to deliberate indifference. . .”); *Gregory v. City of Louisville*, 444 F.3d 725, 753 (6th Cir.2006) (“A systematic failure to train . . . adequately is a custom or policy which can lead to municipal liability.” And, “[l]iability for unconstitutionally inadequate supervision or discipline is treated, for all intents and purposes, as a failure to train.”).

Second, Defendants allege that they are now in compliance with much of what Plaintiffs request and what the Constitution requires, and therefore, that many of Plaintiffs' claims are moot. This is not true, and if it were, it would be irrelevant. Defendants' purported voluntary cessation of unconstitutional conduct does not moot Plaintiffs' claims because Defendants could return to their unlawful conduct after the stipulated order expires.

A. Defendants' COVID-19 Policies Do Not Address Many of the Unconstitutional Conditions of Confinement at the Jail and Where They Do, Are Insufficient or Not Being Practiced.

First, the highly generalized policy documents Defendants have submitted do not address critical aspects of Plaintiffs' allegations and motions, and therefore there can be no dispute that Plaintiffs are likely to succeed on their *Monell* claims:

1. Defendants' policy documents do not address critical social distancing as it relates to spacing detainees in cells around the facility. Dr. Rottnek found that in Division I (as in Division II, *see* pp. 3-4, *supra*), the jail cells have front-facing walls of bars or open steel grids, which allow large aerosolized droplets containing COVID-19 to spread freely between cells. Rottnek Report at 3, 4, 8. And, as of the filing of this reply, Defendants continue to confine detainees in cells and configurations where social distancing is impracticable. *See* pp. 4-5, *supra*. Because Defendants are not adequately spacing the cells used to confine detainees, social distancing is currently

impossible. Defendants’ policies do not address social distancing—what should be a critical component of any COVID-19 response in a jail—whatsoever.

2. Defendants’ policies do not suggest that they have undertaken any “intensified” and “aggressive” cleaning and disinfecting procedures, as recommended by medical experts and the CDC, to reduce the transmission. *See* Ex. 4, Luring Decl. ¶¶ 12, 24. Their policy document makes a mere, fleeting remark to cleaning. *See* Defs.’ Exs. at 20. Defendants make no mention as to how often each area and surface of each division of the Jail should be cleaned and make no reference to disinfecting areas of the Jail. *Id.* Defendants therefore cannot refute Plaintiffs’ declarations and Dr. Rottnek’s report which establish that Defendants are not sufficiently cleaning the facility.

3. Defendants’ policies do not address the provision and distribution of hygiene and cleaning supplies to detainees during the pandemic. In fact, the policy says that hygiene supplies should be distributed consistent with department policy, making no attempt to account for the heightened need of hygiene and cleaning supplies during the COVID-19 pandemic. The thirteen declarations submitted with Plaintiffs’ initial filing demonstrate that detainees are not given sufficient hygiene and cleaning supplies to effectuate the medically required frequent handwashing and cleaning that is necessary to mitigate the spread and contraction of COVID-19. Dr. Rottnek also found that the distribution of hygiene products was insufficient to meet these ends. Defendants therefore cannot refute Plaintiffs’ declarations or Dr. Rottnek’s report, which establishes that they are not providing sufficient hygiene and cleaning products.

4. Defendants’ own policies suggest that they impermissibly quarantine detainees who have symptoms or test positive for COVID-19 in punitive settings. One of the policy documents submitted by Defendants that all inmates with “. . . a confirmed or potential case of

COVID-19 shall be housed in the Behavioral Management Unit at Division III. If overflow space is needed, Segregation at Division III shall be utilized.” Defs.’ Exs. at 13. Behavioral Management and Segregation Units at jails are used to punish detainees. Plaintiffs’ declarations confirm that this written policy is put into practice across the jail.

Second, Defendants submit no evidence suggesting that the policies they put in place to address the COVID-19 pandemic are being followed by Jail staff. Plaintiffs, on the other hand, put forth the mutually corroborating declarations of thirteen detainees across different divisions at the Jail, which individually and cumulatively indicate that the Jail is not doing what it claims to do. Many of the allegations in the declarations were also confirmed by Dr. Rottnek during his inspection:

1. Plaintiffs’ declarations show that, throughout the Jail and in all three divisions, Jail staff are failing to wear PPE. Dr. Rottnek also reported that Jail staff were not wearing protective equipment. Rottnek Report at 6. This evidence affirmatively shows that Defendants’ staff maintains a widespread pattern and practice of not wearing protective equipment in the Jail and that Defendants have failed to train or supervise them in that regard.

2. Plaintiffs’ declarations show that, throughout the Jail, Defendants are failing to provide adequate and timely medical care as it relates to testing and treating inmates who show symptoms of a COVID-19 infection and are categorically failing to address detainees urgent non-COVID-19 related medical needs. *See, e.g.*, Pearson Decl. ¶ 14; H. White Decl. ¶¶ 7, 9, 11; Velez Decl. ¶¶ 2-4; C. White Decl. ¶ 13.

3. Dr. Rottnek’s inspection and report confirmed these allegations. Rottnek Report at 9-10. Defendants put forth no specific evidence showing that they are immediately responding to and testing detainees who have symptoms of COVID-19. Defendants’ general policies, which

purportedly require them to test symptomatic patients, say nothing about the timing of these tests and how quickly they must respond to detainees' complaints. (The one-time Jail wide test does not sufficiently account for the continued spread of COVID-19 in the Jail, Pls. Br. at 22.) Additionally, Defendants put forth *no* evidence demonstrating that they are responding immediately to medical emergencies unrelated to COVID-19. Defs. Br. at 21. Plaintiffs evidence is thus sufficient to establish that Defendants have a policy and practice of not providing timely medical care. Dr. Rottnek found that Defendants' policy of screening Jail staff and persons who enter the facility is insufficient. Given that over 200 Jail staff have already tested positive for COVID-19 and that asymptomatic people can transmit the virus, the policy of testing people when they enter the building is by itself insufficient.

B. Defendants' Remaining *Monell* Arguments are Meritless.

First, Defendants argue that Plaintiffs cannot show that they maintain unconstitutional policy or practice "because neither Oakland County, nor any other municipality, has ever faced an epidemic such as the current COVID-19 pandemic." Defs.' Br. at 14. This argument was raised by the Defendants in Oakland County and rejected by Judge Parker, for it "conflates the concept of municipal liability with qualified immunity." Regardless of the exceptional nature of the circumstances presented, liability can attach if Defendants are aware of the serious threat to Jail inmates posed by COVID-19 and respond to it with a policy that is deliberately indifferent to Plaintiffs' constitutional rights." *Cameron*, 2020 WL 2569868, at *20 (citing *Duvall v. Dallas Cty.*, 631 F.3d 203, 207 (5th Cir. 2011) ("While COVID-19 is a new virus not previously diagnosed in people prior to late 2019, highly contagious viruses are not unique. Unfortunately, nor is the risk of highly contagious viruses or infections spreading throughout a prison facility.")).

Second, Defendants, in passing, and again without citation or support, argue that Plaintiffs cannot seek to impose liability on Wayne County through “anecdotal evidence” in the form of declarations. Defs.’ Br. at 15. This argument misapprehends the nature of the Motion in front of this Court and the Michigan Court Rules. The Michigan Court Rules requires a party seeking a temporary restraining order to submit declarations in support of its motion. MCR 3.310(B)(1)(a) (“A temporary restraining order may be granted . . . if it clearly appears from specific facts shown by affidavit . . . that immediate and irreparable injury, loss, or damage [will occur]”); *see also People v. Patton*, 308 N.W.2d 163, 164, 411 Mich. 490, 492 (1981) (recognizing the use of hearsay testimony in connection with petition for preliminary injunction). In fact, Defendants submitted declaration testimony, as well as policy documents unaccompanied by declarations, in support of their opposition. Defendants could not possibly expect this Court to credit their sworn written testimony, but not Plaintiffs’. Courts routinely rely on affidavit testimony in issuing injunctions pursuant to emergency motions alleging unconstitutional conditions of confinement. *See, e.g., Cameron*, 2020 WL 2569868, at *2; *see generally* 11 C. Wright & A. Miller, *Federal Practice & Procedure*, § 2949 (citing cases) (“It is not surprising that in practice affidavits usually are accepted on a preliminary injunction motion . . .”).³⁷

III. THE CONSENT ORDER DOES NOT PRECLUDE THIS COURT FROM ENTERING PLAINTIFFS’ PROPOSED EMERGENCY ORDER

Defendants do not—and cannot—dispute the evidence presented in the thirteen mutually corroborative detailed and sworn declarations filed with this Court on May 4, 2020, and largely confirmed by Dr. Rottnek during his inspection. The declarations demonstrate that Defendants

³⁷ MCR 3.310 is substantively identical to Fed. R. Civ. P 65, the federal rule governing emergency injunctive relief, and, thus, Federal authority on the issue is instructive. *See e.g. Barnard Mfg. Co. v. Gates Performance Eng’g, Inc.*, 285 Mich. App. 362, 379, 775 N.W.2d 618, 628 (2009) (“Because [the Michigan] court rules are patterned after the federal court rules, in the absence of state authority, this Court may consider federal authorities that interpret analogous provisions of the federal rules.”).

maintained chaotic and dangerous conditions at the Jail, including: widespread indifference across the three Jail divisions; a widespread and consistent failure to provide or use protective equipment like masks and gloves; crowded dorms and bathrooms that force detainees to bathe and sleep within a couple of feet of each other; conditions that force detainees to repeatedly congregate without the ability to engage in social distancing, even in the medical unit; and consistent failure to provide medical attention for days to those exhibiting COVID-19 symptoms.

Instead, Defendants spend much of their brief arguing that this Court should not enter Plaintiff's proposed order because, since the entry of the temporary stipulated consent order, they have been in compliance with much of what Plaintiffs request and what the Constitution requires with respect to hygiene and safety conditions at the Jail. This is a voluntary cessation argument. It fails.

As a threshold matter, some of the relief Plaintiffs seek, including immediately discontinuing the use of Division II to confine detainees during the pandemic, are not covered by the temporary order.³⁸ Defendants' voluntary cessation arguments are therefore inapplicable to those claims for relief.

38

Other requested release that differs from the Stipulated Temporary Amendment includes:

- 1) Provide adequate spacing of six feet or more between people incarcerated so that social distancing can be accomplished, (*see also* Rottnek ¶ 7(a),(f),(i); Lauring 5/2 Decl. ¶ 31, 43; Lauring 6/11 Decl. ¶ 17(b)(i));
- 2) Ensure that each incarcerated person receives, free of charge: (1) an individual supply of liquid hand soap and **paper** towels sufficient to allow **frequent** hand washing and drying each day, and (2) an adequate supply of disinfectant hand wipes or other products effective against the virus that causes COVID-19 for daily cleanings, (*see also* Rottnek ¶ 7(c),(h),(i); Lauring 5/2 Decl. ¶ 32, 33, 39);
- 3) Ensure that all incarcerated people have access to hand sanitizer containing at least 60% alcohol, (*see also* Lauring 5/2 Decl. ¶ 33);
- 4) Provide an adequate stock of daily cleaning supplies, such as sponges, brushes, disinfectant hand wipes, and/or disinfectant products effective against the virus that causes COVID-19, (*see also* Rottnek ¶ 7(c),(h),(i); Lauring 5/2 Decl. ¶ 32, 39; Lauring 6/11 Decl. ¶ 17(b)(vi); CDC Guidance at 7-10, 17-18);
- 5) Provide **daily** access to clean showers and **clean laundry**, including clean personal towels and washrags for each shower;
- 6) Require that all Jail staff wear personal protective equipment, including masks and gloves, **when interacting with any person or when touching surfaces in cells or common areas**, (*see also* Rottnek ¶ 7(e));

In addition, Defendants have not met their burden in establishing voluntary cessation as it relates to the request for relief that is currently covered by the temporary order. Both the Michigan Supreme Court and the United States Supreme Court have long held that voluntary cessation of illegal conduct does not moot a claim. *Dep't of Social Services v. Emmanuel Baptist Preschool*, 434 Mich. 380, 425, 455 N.W.2d 1 (1990) (Cavanagh, J., concurring) (quoting *United States v. W T Grant Co.*, 345 U.S. 629, 633 (1953)). Defendants bear the burden of establishing voluntary cessation and must demonstrate that (1) they have ceased the illegal conduct” and (2) “that the alleged wrong will not arise again.” *Anglers of AuSable, Inc. v. Department of Environmental Quality*, 783 N.W.2d 502, 503, 486 Mich. 982, 984 (Mich.). Here, Defendants cannot establish that they have met either factor.

First, and most importantly, Dr. Rottnek’s inspection report and the declarations submitted with this reply demonstrate that after entry of the temporary order, were *still* failing to provide constitutional conditions of confinement during the COVID-19 pandemic. *See* pp. 3-13, *supra*. As the Supreme Court has noted, “[t]here is no mere risk that [a defendant] will repeat its allegedly wrongful conduct, [than when] it has already done so. *Northeastern Fla. Chapter of Associated*

7) Take each incarcerated person’s temperature daily (with a functioning, properly operated, and sanitized thermometer) to identify potential COVID19 infections;

8) Conduct **immediate** testing for anyone displaying known symptoms of COVID-19 and who has potentially been exposed to infection, (*see also* Rottnek ¶ 7(b); Lauring 6/11 Decl. ¶ 17(b)(iv));

9) Ensure that individuals identified as having COVID-19 or having been exposed to COVID-19 receive adequate medical care and are properly quarantined **in a non-punitive setting**, with continued access to showers, recreation, mental health services, reading materials, phone and video calls with loved ones, communications with counsel, and personal property, (*see also* Rottnek ¶ 7(g); Lauring 5/2 Decl. ¶ 30, 37-38; Lauring 6/11 Decl. ¶ 17(b)(vii));

10) Respond to all emergency (as defined by the medical community) requests for medical attention within an hour, (*see also* Rottnek ¶ 7(d); Lauring 5/2 Decl. ¶ 36);

11) Cease and desist retaliatory disciplinary action in response to (a) incarcerated persons’ requests for medical attention and basic, necessary protections, and/or (b) efforts by incarcerated persons to publicize unsafe and life-threatening conditions inside the Jail, (*see also* Rottnek ¶ 7(d); Lauring 5/2 Decl. ¶ 36; Lauring 6/11 Decl. ¶ 17(b)(vii)); and

12) Appoint an independent monitor (who can enter the Jail to ensure compliance with this Court’s order).

General Contractors of America v. City of Jacksonville, Fla., 508 U.S. 656, 662 (1993); *Sullivan v. Benningfield*, 920 F.3d 401, 411 (6th Cir. 2019) (“before voluntary cessation of a practice could ever moot a claim, the challenged practice must have actually ceased.”). Defendants therefore do not satisfy the first factor of the voluntary cessation test.

Second, the order is temporary and expires on June 18, 2020. Efforts (disputed as this may be) to comply with a temporary order do not demonstrate that Defendants have ceased the illegal conduct. *See City of Los Angeles v. Lyons*, 461 U.S. 95, 101 (1983) (finding that intervening events were “not permanent” and could have not “irrevocably eradicated the effects of the alleged violation.”); *Milwaukee Police Ass’n v. Jones*, 192 F.3d 742, 747 (7th Cir. 1999) (efforts to comply with TRO did not demonstrate that the wrong will not be repeated). In a recent case challenging the conditions of confinement at a jail during the COVID-19 pandemic, a federal district court held that the entry of a temporary restraining order did not establish that defendants had ceased the illegal conduct. *Swain v. Junior*, No. 1:20-CV-21457-KMW, 2020 WL 2078580, at *14 (S.D. Fla. Apr. 29, 2020). So, even if Defendants had voluntarily ceased the unconstitutional conduct—and they have not—Defendants’ argument that their change purported changes in policy and practice precludes this Court from ordering the relief Plaintiffs’ seek would still be meritless. That a temporary stipulated order requires them to cure some of the constitutional deficiencies does not change this fact, as Defendants are “free to return to [their] old ways” once the order expires. *W T Grant Co.*, 345 U.S. at 632.

Because Defendants’ voluntary cessation argument does not apply, normal rules of civil procedure govern. This Court thus must base its order on the facts alleged and the facts that existed when the Plaintiffs’ filed this Motion. In light of Plaintiffs’ overwhelming evidence, Defendants’

failure to proffer facts beyond highly generalized evidence regarding purported efforts to marginally improve some conditions within the Jail must be fatal.

Plaintiffs, however, have no objection to this Court's entry of the temporary consent order as a preliminary injunctive order, in addition to the relief Plaintiffs seek here that was not included in the temporary order. But the entry of a stipulated temporary order does not change the operative facts that existed at the time Plaintiffs filed this Motion, and it does not preclude this Court from entering the order that Plaintiffs' seek.

III. THE PRISON LITIGATION REFORM ACT IS INAPPLICABLE

Defendants argue that Plaintiffs cannot demonstrate a likelihood of success on the merits because they have not exhausted administrative remedies as required by the Prison Litigation Reform Act ("PLRA").³⁹ This argument defies logic.

Plaintiffs' Motion was filed pursuant to a stipulated order permitting Plaintiffs to reopen this case, which was originally filed in 1971, 25 years before the enactment of the PLRA in 1996. *Wayne County Jail Inmates v. Wayne County Chief Executive Officer*, 444 N.W.2d 549, 551, 178 Mich. App. 634, 637 (Mich. App. 1989); *Martin v. Hadix*, 527 U.S. 343, 343 (1999). Because the PLRA is not retroactive, it does not apply to motions brought in this case. *Wright v. Morris*, 111 F.3d 414, 418 (6th Cir. 1997) (concluding that "the text of the PLRA indicates that the new administrative exhaustion requirement applies only to cases filed after the Act's passage."); *Landgraf v. USI Film Prods.*, 511 U.S. 244, 275 n.29 (1994) ("A new rule concerning the filing of

³⁹ PLRA exhaustion is an affirmative defense, *Jones v. Bock*, 549 U.S. 199, 200 (2007). Defendants therefore bear the burden of proving that no member of the Detainee class has exhausted their administrative remedy. *Taylor v. Lindamoon*, 2017 WL 4176338, at *4 (M.D. Tenn. Sept. 19, 2017) ("The doctrine of vicarious exhaustion allows a single member of a class action to satisfy the exhaustion requirement for all class members by exhausting his or her own administrative remedies with respect to each class-action claim.").

complaints would not govern an action in which the complaint had already been properly filed under the old regime.”). And under the PLRA, this is not a new “action,” such that the exhaustion requirement would be triggered. *See Jones v. Bock*, 549 U.S. 199, 219 (2007) (interpreting the statutory term “action” to mean the filing of a complaint).

Even if this Court finds that the PLRA’s exhaustion requirement is applicable to motions filed in this case, Defendants’ argument would fail because Defendants’ grievance procedures are unavailable to detainees. *See Ross v. Blake*, 136 S. Ct. 1850, 1856 (2016) (holding that a detainee “need only exhaust those remedies that are ‘available’ to him”). Defendants’ grievance process does not provide a forum to raise the emergency issues detainees raise here and have expedited consideration of their request. To the contrary, Defendants’ grievance process is long, tedious, and multi-tiered. It could take a detainee almost 70 days to exhaust the grievance process. *See* Defs.’ Ex. 10. Thus, if a detainee has an emergency that must be met in less than two weeks—such as needing soap to wash one’s hands in a crowded dorm as a viral infection spreads—Defendants’ grievance procedures are not “available” to resolve the emergency. *See Fletcher v. Menard Corr. Ctr.*, 623 F.3d 1171, 1174 (7th Cir. 2010) (“If it takes two weeks to exhaust a complaint that the complainant is in danger of being killed tomorrow, there is no ‘possibility of some relief’ and so nothing for the prisoner to exhaust.”). Addressing the exhaustion requirement in the context of the COVID-19 pandemic, Supreme Court Justice Sonia Sotomayor, joined by Justice Ruth Bader Ginsburg, recently acknowledged that when faced with “a rapidly spreading pandemic[,]” administrative remedies may be “unavailable,” “where an inmate faces an imminent risk of harm that the grievance process cannot or does not answer, the PLRA’s textual exception could open the courthouse doors where they would otherwise stay closed.” *Valentine v. Collier*, U.S. —, — S.Ct. —, — L.Ed.2d —, 2020 WL 2497541, *1 (May 14, 2020); *see also*

Cameron, 2020 WL 2569868 at *16. Additionally, detainees have submitted ample evidence that Jail staff threaten, intimidate, and retaliate against them when they raise grievances about COVID-19, further establishing that the grievance process is unavailable.

IV. THE UNTIMELY AFFIDAVITS OF BRIDGETTE JONES AND LOUIS SHICKER DO NOT CHANGE THIS COURT’S ANALYSIS

Six days after Defendants submitted their Response to Plaintiffs’ Motion for Temporary Restraining Order and Preliminary Injunction and on the day Plaintiffs’ Reply is due, Defendants, without notice or leave of this Court, filed three affidavits: 1) Bridgette Jones, 2) Louis Shicker, and 3) and an updated affidavit from Mark Morrissey.

Dr. Shicker, a physician with two decades of experience in correctional health care, has a similar background to Dr. Rottnek. Unlike Dr. Rottneck, however, neither Dr. Shicker nor Ms. Jones has stepped foot inside of the Jail, let alone conducted a thorough inspection of its facilities. Neither Dr. Shicker nor Ms. Jones have apparently spoken with any Jail staff or detainees.

With the exception of information about their backgrounds, the affidavits of Bridgette Jones, an epidemiologist, and Dr. Shicker are identical in language. The attestations of Ms. Jones and Dr. Shicker both lack credibility and do not change the analysis here.

The affiants make conclusory statements that lack any foundation as well as statements that are incorrect:

1. The Jail’s population has been reduced to the point where social distancing can be achieved;
2. The medically vulnerable individuals...have been released if the risk to the public is tolerable;
3. The Wayne County Jail and its stakeholders have headed the CDC Recommendations and have enacted adequate pandemic plans;
4. It is unnecessary to close Division II because preventative measure can be enacted to prevent the spread of the virus, as evidenced by the test results; and
5. Dr. Lauring and Dr. Rottnek “rely on certain parts of the CDC guidelines in formulating their opions,” and “the guidelines are intended to be used and adapted to one’s own setting.”

The affiants' attestations assume that the Jail is complying with the policies its promulgated in response to COVID-19. As stated earlier, the detainee declarations and Dr. Rottnek's observations prove that the Jail is not complying with its own policies. Dr. Lauring also notes that "the results suggest that the Jail is not practicing all of the mitigation and prevention efforts set forth in the directives, orders, and policies adopted since March 13, 2020," Ex. 4 ¶ 21, and that "it is apparent that some of the policies are dangerously inadequate." *Id* at ¶ 31.

For the reasons discussed fully in Plaintiffs' response to Defendants' Motion to Strike the Inspection Report, Dr. Rottnek relies on much more than the CDC guidelines. So, too, does Dr. Lauring. To be sure, in his supplemental affidavit, Dr. Lauring "make[s] clear that [his] expert opinion derives not only from [his] review of the CDC guidelines for correctional facilities, but from [his] extensive experience in respiratory viruses and other infectious diseases, as documented in paragraphs 5-15 of this affidavit:

1. I received my medical degree from the University of Washington in 2002. I subsequently trained as a Resident in Internal Medicine at the University of California, San Francisco (UCSF) – one of the country's top academic medical centers. In recognition of my skills as a clinician and teacher, I was selected by the faculty and my peers to serve as Chief Medical Resident. I subsequently trained as a Fellow in Infectious Diseases and have been Board Certified in Infectious Diseases (American Board of Internal Medicine) since 2008. I have practiced as an Infectious Diseases specialist, first at UCSF, and since 2012, at the University of Michigan.
2. I completed a PhD in Molecular and Cellular Biology at the University of Washington in 2000. My thesis research was on how viruses like HIV cause disease. I performed postdoctoral research in virus evolution from 2007-2012. I have directed a research laboratory at the University of Michigan since 2012. I continue to study how viruses evolve and spread with a focus on influenza and other respiratory viruses. Based on my scientific success and track record of innovation, I have received several highly competitive awards, including: the Pfizer Young Investigator Award in Vaccine Development, a Doris Duke Charitable Foundation Clinician Scientist Development Award, and a Burroughs Wellcome Fund Investigator in the Pathogenesis of Infectious Disease Award.
3. I participate in the US Hospital Vaccine Effectiveness Network and the US Influenza Vaccine Effectiveness Network, two large CDC-funded studies of influenza virus

epidemiology in communities and healthcare environments. I am the Principal Investigator on a 5-year, \$3.7 million NIH grant on respiratory virus transmission, which recently scored in the top percentile and is expected to begin on July 1, 2020.

4. I am currently an Associate Professor with Tenure in the Division of Infectious Diseases and the Department of Microbiology and Immunology at the University of Michigan.
5. In 2019, I became a Fellow of the Infectious Diseases Society of America, an honor given to individuals who have demonstrated excellence in Infectious Diseases. In 2020, I was elected to the Governing Council of the American Society for Virology.
6. I cared for one of the first two patients with COVID-19 in the State of Michigan on March 10, 2020. I watched Governor Whitmer announce these first cases while at the patient's bedside in the intensive care unit at the University of Michigan Hospital. From mid-March through the end of May, I spent 5 weeks taking care of COVID-19 patients at the University Hospital. Most of the patients were in the Intensive Care Units.
7. Since March, I have been instrumental to the University's response to COVID-19. I developed our diagnostic and testing guidelines, contributed to institutional treatment guidelines, and worked closely with hospital infection control to manage patient flow over the first two weeks of the Michigan epidemic. I helped to set up our Regional Infection Containment Unit (RICU), a dedicated COVID-19 intensive care unit.
8. My laboratory performed key experiments for a University of Michigan N95 disinfection project, which informed the hospital's decision to process masks for re-use at a time of critical PPE shortages (<https://www.medrxiv.org/content/10.1101/2020.04.28.20084038v1>). We are in the process of sequencing SARS-CoV-2 specimens from 400 patients and 250 health care workers, with the goal of understanding COVID-19 transmission and spread.
9. I helped to set up the Medical Center's COVID-19 Patient Registry and the COVID-19 Biospecimen Repository. I serve on the University's COVID-19 Research Prioritization Committee and COVID-19 Clinical Trials Feasibility Review Committee. I also serve on the Institutional Biosafety Committee, which reviews all protocols for pathogen research at the University of Michigan. I am Co-Director of the University's new Michigan Center for Infectious Disease Threats.
10. Based on my training, my expertise in respiratory virus transmission, and my deep and varied experiences with SARS-CoV-2 and COVID-19, I am very well qualified to comment on many aspects of this case, including: basic biology of SARS-CoV-2 and methods for its inactivation; how this virus transmits from person to person and spreads through communities, healthcare settings, and congregate environments; infection control procedures; COVID-19 epidemiology; diagnostic tests for COVID-19; and clinical care of patients with COVID-19.

Dr. Luring explains why Mr. Morrissey's, Dr. Shicker's, and Ms. Jones's attestations about the infection rate and test results are incorrect or misleading and should not be credited. ¶¶ 19, 20, 22-25, 27. He further explains why their conclusions regarding the closure of Division II, social distancing, the risk to Jail detainees, and the adequacy of the Jail's policies are incorrect. ¶¶ 28-31, 33.

Put simply, in his supplemental declaration, Dr. Luring, applying his expertise in infectious diseases to Dr. Rottnek's findings, concludes that the Jail must “**stop housing inmates in Division II as soon as possible**. And then stop requiring staff to work there.” Rottnek Report, p. 12. In so finding, he notes that he “strongly disagree[s] with Ms. Bridgette Jones's and Dr. Louis Shicker's judgment on this issue,” and explains why he agrees with Dr. Rottnek's recommendations:

I would also add that the medically vulnerable detainees housed in Division II must be moved immediately. Poor ventilation and extensive disrepair creates an unreasonable risk infection of airborne illnesses, and, as Dr. Rottnek further noted, once a person is infected, the conditions create a grave risk of serious illness or death because they exacerbate respiratory conditions and chronic conditions. Further, the sub-par medical care for non-COVID-19-related health problems strongly indicates that Jail staff remains ill-equipped and unprepared to manage and prevent a further outbreak of COVID-19 and any related complications. And, notwithstanding the fact that the medical care is deficient, and the conditions increase both the likelihood of infection and the risk of severe consequences from infection, detainees are incapable of achieving social distancing and are not receiving sufficient hygiene supplies.

Accordingly, the untimely declarations filed by Defendants in support of their opposition should not be given any weight by this Court, nor should they, in any way, change this Court's analysis.

CONCLUSION

For these reasons, Plaintiffs ask this Court to issue a temporary restraining order and preliminary injunction ordering the relief requested in their motion.

Dated: June 11, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing document was filed with the Clerk of Court using this Court's electronic filing system.

/s/Allison L. Kriger

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

WAYNE COUNTY JAIL INMATES, et. al.,

Case No. 71 173 217 CZ

Hon. Timothy M. Kenny

Plaintiffs,

v

WILLIAM LUCAS, et. al.,
Defendants.

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EXHIBIT LIST

1. Declaration of Nayeon Kim
2. Jail Population Report
3. Sworn Declarations
4. Affidavit of Adam Lauring

DECLARATION OF NAYEON KIM

I, Nayeon Kim, declare:

1. My name is Nayeon Kim. I am a legal intern at the Advancement Project National Office. I am supporting counsel for Plaintiffs in Case No. 71 173 217 CZ, *Wayne County Jail Inmates et al., v. William Lucas et al.*
2. I created Exhibit A: “Wayne County COVID-19 Tracker Positive Type” (“Positive Type”) and Exhibit B: “Wayne County COVID-19 Tracker Total Positives” (“Total Positives”). These spreadsheets display the individuals at Wayne County Jail who tested positive for COVID-19 based on the information in Exhibit C “Covid-19 Results” and Exhibit D “Inmate Tracking 5.28.2020.” The information in Exhibit D contains a tab entitled “New View” which I will reference to follow.
3. In Exhibit A, I organized the individuals who tested positive into categories by test type, according to the information in Exhibit C. Individuals who were at Wayne County Jail for more than 21 days before testing positive are highlighted yellow, which I calculated according to the booking information detailed in Exhibit D.
4. In Exhibit A, the category “Antibody Only Test” shows individuals who tested positive from the antibody test, also known as “COVID SARS-COV-2 IGG,” according to the information provided in Exhibit C. This category shows that 104 of the 116 individuals in this category were at Wayne County Jail for more than 21 days before they tested positive for COVID-19. 12 of the 116 individuals were at Wayne County Jail 21 days or less before they tested positive. This category additionally shows that 90 of the 116 individuals in this category were admitted into the Wayne County Jail before the first

COVID-19 case was reported in Michigan on March 10, 2020. 26 of the 116 individuals were admitted into the Wayne County Jail on or after March 10, 2020.

5. In Exhibit A, the category “Virus Only or Both Virus + Antibody Tests” shows individuals who tested positive from the virus test, also known as “SARS COV 2 RNA, RT PCR,” or both virus and antibody tests, according to the information provided in Exhibit C. This category is organized to show the date which individuals tested positive, whether from the virus test or both virus and antibody tests. This category shows that 56 of the 58 individuals in this category were at the Wayne County Jail for more than 21 days before they tested positive for COVID-19, according to the booking information detailed in Exhibit D.
6. In Exhibit A, the category “Test Type Unknown” lists individuals who were listed on “New View” but not on “Covid-19 Results.” This category shows that 9 of the 12 individuals in this category were at the Wayne County Jail for more than 21 days before testing positive for COVID-19.
7. Based on the information in Exhibit A, I calculated that 169 of the 186 individuals in this spreadsheet were at the jail for more than 21 days before testing positive for COVID-19, including individuals who have since been released.
8. Exhibit B organizes and displays more detailed information for the individuals who have tested positive, based on the information contained in Exhibit C and Exhibit D, including: facility, housing unit, date admitted, date tested, the number of days between admitted and tested, and dates of release for those respective individuals. Individuals who were at Wayne County Jail for more than 21 days before testing positive are highlighted yellow, according to the booking information detailed in Exhibit D.

I declare under penalty of perjury that the foregoing is true and correct to my own knowledge.

DATED: June 7, 2020
Ashland, Oregon



Nayeon Kim

EXHIBIT A

Antibody Only Test					
#	Name	Date Admitted	Admitted before 3/10/2020 (1st Michigan case)?	Tested Positive	Days between admitted-tested
					Yellow > 21
1		12/4/2019	Y	5/8/2020	156
2		10/11/2019	Y	5/9/2020	211
3		2/22/2020	Y	5/9/2020	77
4		5/4/2020	N	5/9/2020	5
5		2/12/2019	Y	5/9/2020	451
6		12/5/2019	Y	5/8/2020	155
7		9/14/2018	Y	5/8/2020	602
8		5/6/2020	N	5/9/2020	3
9		12/12/2019	Y	5/9/2020	149
10		2/5/2020	Y	5/9/2020	94
11		12/14/2019	Y	5/9/2020	147
12		5/7/2020	N	5/9/2020	2
13		12/30/2019	Y	5/9/2020	131
14		11/7/2019	Y	5/10/2020	185
15		1/18/2020	Y	5/7/2020	110
16		12/11/2019	Y	5/8/2020	149
17		11/27/2019	Y	5/9/2020	164
18		3/2/2019	Y	5/10/2020	435
19		2/13/2019	Y	5/7/2020	449
20		11/19/2019	Y	5/9/2020	172
21		10/7/2019	Y	5/8/2020	214
22		3/13/2020	N	5/8/2020	56
23		5/10/2020	N	5/10/2020	81
24		1/17/2020	Y	5/7/2020	111
25		12/23/2019	Y	5/8/2020	137
26		2/7/2020	Y	5/9/2020	92
27		2/28/2020	Y	5/9/2020	71
28		8/6/2019	Y	5/7/2020	275

29		12/5/2018	Y	5/8/2020	520
30		10/28/2019	Y	5/9/2020	194
31		4/2/2020	N	5/9/2020	37
32		5/4/2020	N	5/8/2020	4
33		5/10/2019	Y	5/9/2020	365
34		3/18/2020	N	5/8/2020	51
35		2/7/2020	Y	5/10/2020	93
36		8/9/2019	Y	5/9/2020	274
37		12/10/2019	Y	5/8/2020	150
38		3/23/2020	N	5/9/2020	47
39		3/13/2020	N	5/10/2020	58
40		2/18/2020	Y	5/8/2020	80
41		3/3/2020	Y	5/9/2020	67
42		3/17/2020	N	5/7/2020	51
43		10/2/2019	Y	5/8/2020	219
44		12/9/2019	Y	5/7/2020	150
45		10/15/2019	Y	5/8/2020	206
46		4/13/2020	N	5/9/2020	26
47		5/6/2020	N	5/8/2020	2
48		1/7/2020	Y	5/9/2020	123
49		11/27/2019	Y	5/8/2020	163
50		12/3/2019	Y	5/9/2020	158
51		9/18/2019	Y	4/22/2020; 5/7/2020; 5/15/2020	217
52		12/25/2019	Y	5/10/2020	137
53		10/2/2019	Y	5/8/2020	219
54		2/5/2020	Y	5/10/2020	93
55		3/4/2020	Y	5/9/2020	66
56		3/17/2020	N	5/7/2020	51
57		9/14/2019	Y	5/7/2020	236
58		2/23/2020	Y	5/7/2020	74
59		1/13/2020	Y	5/9/2020	117
60		2/21/2020	Y	5/9/2020	78
61		5/6/2020	N	5/8/2020	2
62		2/26/2020	Y	5/7/2020	71
63		3/4/2020	Y	5/7/2020	64
64		8/26/2019	Y	5/7/2020	255
65		4/30/2020	N	5/8/2020	8
66		1/15/2020	Y	5/10/2020	116
67		5/16/2019	Y	5/7/2020	357
68		5/1/2020	N	5/8/2020	7
69		12/4/2019	Y	5/10/2020	158

70		8/14/2019	Y	5/7/2020; 5/9/2020	269
71		5/8/2020	N	5/9/2020	1
72		6/11/2019	Y	5/9/2020	333
73		8/12/2019	Y	5/8/2020	270
74		12/29/2019	Y	5/7/2020	130
75		2/27/2020	Y	5/10/2020	73
76		1/20/2020	Y	5/7/2020	108
77		10/17/2018	Y	5/8/2020	569
78		10/15/2019	Y	5/8/2020	206
79		1/10/2020	Y	5/9/2020	120
80		9/23/2019	Y	5/9/2020	229
81		3/22/2020	N	5/9/2020	48
82		6/22/2019	Y	5/7/2020	320
83		1/15/2020	Y	5/10/2020	116
84		3/5/2020	Y	5/8/2020	64
85		11/19/2019	Y	5/9/2020	172
86		3/10/2020	N	5/7/2020	58
87		2/4/2020	Y	5/8/2020	94
88		1/24/2020	Y	5/9/2020	106
89		3/6/2020	Y	5/9/2020	63
90		2/14/2020	Y	5/7/2020	83
91		3/16/2020	N	5/8/2020	53
92		3/5/2020	Y	5/9/2020	65
93		12/26/2019*	Y	5/9/2020	135 *Based on Odyssey's report of charges filed 12/26/2019
94		12/24/2019	Y	5/9/2020	137
95		4/23/2020	N	5/8/2020	15
96		8/9/2019	Y	5/9/2020	274
97		1/2/2020*	Y	5/7/2020	126 *Based on Odyssey's report of charges filed 1/2/2020
98		1/6/2020	Y	5/10/2020	125
99		5/7/2020	N	5/9/2020	2
100		1/30/2020	Y	5/7/2020	98
101		4/21/2020	N	5/9/2020	18
102		2/27/2020	Y	5/8/2020	71
103		2/28/2020	Y	5/9/2020	91
104		12/29/2019	Y	5/9/2020	91
105		3/18/2020	N	5/7/2020	50
106		1/10/2020	Y	5/7/2020	118
107		2/20/2020	Y	5/9/2020	79
108		3/17/2020	N	5/9/2020	53
109		2/20/2020	Y	5/9/2020	79
110		9/2/2019	Y	5/9/2020	250

111		1/15/2020	Y	5/9/2020	115
112		6/21/2019	Y	5/9/2020	323
113		2/5/2020	Y	5/9/2020	94
114		1/20/2020	Y	5/7/2020	108
115		2/28/2020	Y	5/10/2020	72
116		5/9/2019	Y	4/13/2020; 5/9/2020	366

TOTAL	at jail more than 21 days before testing positive =	104
	at jail 21 days or less before testing positive =	12
	admitted to jail before 3/10/2020 =	90 77.59%
	admitted to jail on or after 3/10/2020 =	26 22.41%

SUMMARY	104/116 individuals who tested positive from the [antibody only] test were in the jail for more than 21 days before testing positive
	12/116 individuals who tested positive from the [antibody only] test were in the jail for 21 days or less before testing positive
	90/116 individuals who tested positive from the [antibody only] virus test were admitted before 3/10/2020
	26/116 individuals who tested positive from the [antibody only] virus test were admitted on or after 3/10/2020

***RELEASED (KNOWN/REPORTED IN "NEW VIEW") = 6**
TOTAL INDIVIDUALS WHO TESTED POSITIVE (ACROSS TESTS, INCLUDING RELEASED, EXCLUDING UNKNOWN) WHO WERE AT THE JAIL FOR MORE THAN 21 DAYS = 169
TOTAL INDIVIDUALS COMBINED (ACROSS TESTS) = 186
PERCENT = 90.86%

Last updated: June 6, 2020

Virus Only or Both Virus + Antibody Tests

Name	Tested Positive		Days between admitted-tested
	Virus Test	Antibody Test	Yellow > 21
	5/8/2020	5/8/2020	9 *Based on Odyssey's report of charges filed 4/29/2020
	5/8/2020	5/8/2020	276
	5/7/2020	5/7/2020	154
	5/8/2020	5/8/2020	144
	5/9/2020	5/9/2020	103
	5/7/2020	5/7/2020	442
	5/7/2020	5/9/2020	2 *Based on Odyssey's report of charges filed 5/7/2020
	5/8/2020	5/8/2020	141
	5/9/2020	5/9/2020	37
	5/8/2020	5/8/2020	144
	5/7/2020	5/7/2020	216
	5/8/2020	5/8/2020	362
	5/7/2020		66
	5/10/2020	5/10/2020	262
	5/9/2020	5/9/2020	201
	5/7/2020	5/7/2020	51
	5/1/2020; 5/11/2020		38
	5/9/2020	5/9/2020	193
	5/7/2020	5/7/2020	65
	5/8/2020	5/8/2020	92
	5/8/2020		98
	5/8/2020	5/8/2020	105
	5/10/2020	5/10/2020	204
	5/7/2020	5/7/2020	568
	5/7/2020	5/7/2020	206
	5/7/2020	5/7/2020	316
	5/8/2020	5/8/2020	107
	5/8/2020		96

	5/7/2020		265
	5/7/2020	5/7/2020	64
	5/8/2020	5/8/2020	147
	5/7/2020	5/7/2020	185
	5/8/2020	5/8/2020	140
	5/9/2020		67
	5/7/2020	5/7/2020	157
	5/8/2020	5/8/2020	73
	5/10/2020	5/10/2020	172
	5/9/2020	5/9/2020	119
	5/10/2020 ("New View") or 5/11/2020 ("Covid-19 Results")		143
	4/22/2020		141
	5/9/2020	5/9/2020	306
	5/7/2020	5/7/2020	111
	5/8/2020	5/8/2020	122
	4/29/2020		155
	4/24/2020		184
	5/8/2020	5/8/2020	213
	4/27/2020		55
	5/7/2020	5/7/2020	84
	5/9/2020	5/9/2020	100
	5/7/2020		92
	5/8/2020		72
	5/11/2020		199
	5/9/2020	5/9/2020	58
	5/7/2020		781
	4/27/2020; 5/11/2020		242
	5/7/2020	5/7/2020	139
	5/7/2020	5/7/2020	155
	5/7/2020	5/7/2020	353
TOTAL	in jail more than 21 days =		56
SUMMARY	56/58 individuals who took either the [virus only] test or [both virus and antibody] tests were in the jail for more than 21 days before testing positive		96.55%

Test Type Unknown		
Name	Tested Positive	Days between admitted-tested
		Yellow > 21
[REDACTED]	4/7/2020	473
	4/6/2020	485
	4/22/2020	61
	4/20/2020	126
	4/7/2020	32
	4/22/2020	34
	5/26/2020 ("New View" reports "patient stated test positive at the hospital" but results pending from this test - counted as <u>unknown</u>)	5
	5/7/2020	52
	4/6/2020? ("New View" reports "negative" result with note "remains positive at day 14" - *counted here as <u>unknown</u>)	*374
	4/27/2020	3
4/22/2020; 5/15/2020	34	
4/22/2020; 5/4/2020	45	
TOTAL	in jail more than 21 days before testing positive (excluding "unknown") =	9

EXHIBIT B

TESTED POSITIVE

#	Name	Facility	Housing Unit	Date Admitted	Date Tested Positive	Days between admitted-tested	Date Released (if applicable)
1		Division 1	10-NW-09-001	12/4/2019	5/8/2020	156	no info
2		Division 1	10-NE-05-01	10/11/2019	5/9/2020	211	no info
3		Division 1	06-SW-11-002	2/22/2020	5/9/2020	77	no info
4		Division 1	10-SW-06-002	5/4/2020	5/9/2020	5	no info
5		Unknown	Unknown	4/29/2020	5/8/2020	9	no info
6		Division 3	E1-213-01	2/12/2019	5/8/2020	451	no info
7		Division 2	6-Annex-A6-14-06	12/5/2019	5/8/2020	155	no info
8		Division 2	6-Annex-A6-11-04	8/6/2019	5/8/2020	276	no info
9		Division 2	4OId-04-04-09	9/14/2018	5/8/2020	602	no info
10		Division 2	6-Annex-A6-14-06	12/5/2019	5/7/2020	154	no info
11		Division 1	06-NE-03-001	12/16/2019	5/8/2020	144	no info
12		Division 1	11-NW-13-001	5/6/2020	5/9/2020	3	no info
13		Division 1	8-NE-08-002	12/12/2019	5/9/2020	149	no info
14		Division 3	G3-403-01	1/27/2020	5/9/2020	103	no info
15		Division 3	3-OId-03-10-01	2/20/2019	5/7/2020	442	no info
16		Division 2	E3-323-01	2/5/2020	5/9/2020	94	no info
17		Division 3	H3-316-01	12/21/2018	4/7/2020	473	no info
18		Division 1	10-NW-06-001	12/14/2019	5/9/2020	147	no info
19		Division 3	G1-222-01	5/7/2020	5/9/2020	2	no info
20		Unknown	Unknown	5/7/2020	5/9/2020	2	no info
21		Division 2	04-OId-04-05-08	12/30/2019	5/9/2020	131	no info

> 21 days = yellow

22	Division 2	04-Old-04-08-02	11/7/2019	5/10/2020	185	no info
23	Division 1	6-NE-04-001	12/19/2019	5/8/2020	141	no info
24	Division 2	3-Old 03-05-04	1/18/2020	5/7/2020	110	no info
25	Division 1	10-NE-07-002	12/11/2019	5/8/2020	149	no info
26	Division 3	G3-303-01	11/27/2019	5/9/2020	164	no info
27	"CMU"	10SE	12/8/2018	4/6/2020	485	4/17/2020
28	Division 3	E1-108-01	3/2/2019	5/10/2020	435	no info
29	Division 1	06-NE-09-001	11/19/2019	5/9/2020	172	no info
30	Division 2	5-Annex A5-11-10	2/13/2019	5/7/2020	449	no info
31	Division 3	F1-123-01	4/2/2020	5/9/2020	37	5/26/2020
32	Division 2	6-Annex-A6-14-01	10/7/2019	5/8/2020	214	no info
33	Division 1	06-NE-05-001	3/13/2020	5/8/2020	56	no info
34	Division 3	F1-228-01	2/19/2020	5/10/2020	81	no info
35	Division 2	3-Old-05-03-02	1/17/2020	5/7/2020	111	no info
36	Division 1	10-NE-06-001	12/23/2019	5/8/2020	137	no info
37	Division 3	E3-421-01	2/7/2020	5/9/2020	92	no info
38	Division 1	10-NW-7-001	12/16/2019	5/8/2020	144	no info
39	Division 2	6-Annex-A6-11-07	10/4/2019	5/7/2020	216	no info
40	Division 3	E1-220-01	2/28/2020	5/9/2020	71	5/15/2020
41	Division 2	2-Old 02-08-04	8/6/2019	5/7/2020	275	no info
42	Division 2	6-Annex-A6-11-10	12/5/2018	5/8/2020	520	no info
43	Division 3	G3-402-02	10/28/2019	5/9/2020	194	no info
44	Division 3	G3-414-01	4/2/2020	5/9/2020	37	no info
45	Division 1	04-NE-07-001	5/4/2020	5/8/2020	4	no info
46	Division 3	E1-126-01	5/10/2019	5/9/2020	365	no info
47	Division 1	06-NE-02-001	5/12/2019	5/8/2020	362	no info
48	Division 3	H3-321-01	3/2/2020	5/7/2020	66	no info
49	Division 2	6-Annex-A6-14	3/18/2020	5/8/2020	51	no info

50		"Unit Quarantine"	2-AA-14-01	2/21/2020	4/22/2020	61	5/6/2020 (with tether) *not in 2nd tab because released
51		Division 3	G1-220-01	8/22/2019	5/10/2020	262	no info
52		Division 1	10-NW-03-001	10/21/2019	5/9/2020	201	no info
53		Division 3	G1-219-01	2/7/2020	5/10/2020	93	no info
54		Division 2	4-Annex-AA-14-03	12/16/2019	4/20/2020	126	no info
55		Division 3	G3-405-01	8/9/2019	5/9/2020	274	no info
56		Division 2	4-Old-04-09-10	3/17/2020	5/7/2020	51	no info
57		Division 1	04-NE-0.5T.O/C.O- 001	12/10/2019	5/8/2020	150	no info
58		Division 3	H3-319-01	3/24/2020	5/1/2020	38	no info
59		Division 3	E3-321-01	10/29/2019	5/9/2020	193	no info
60		Division 2	5-Old-05-06-01	3/3/2020	5/7/2020	65	no info
61		Division 2	4-Old-04-08-05	2/6/2020	5/8/2020	92	no info
62		Division 1	10-NW-16-002	3/23/2020	5/9/2020	47	no info
63		Division 1	06NE-01-001	1/31/2020	5/8/2020	98	no info
64		Division 3	H1-125-01	3/13/2020	5/10/2020	58	no info
65		Division 1	10-NE-09-002	2/18/2020	5/8/2020	80	no info
66		Division 3	F1-111-01	3/3/2020	5/9/2020	67	no info
67		Division 2	02-Old-02-02-05	3/17/2020	5/7/2020	51	no info
68		Division 2	6-Annex-A6-11-01	10/2/2019	5/8/2020	219	no info
69		Division 1	04-SW-13-001	1/24/2020	5/8/2020	105	no info
70		Division 2	6-Annex-A6-14-11	12/9/2019	5/7/2020	150	no info
71		Division 2	5-Annex A5-13-08	10/15/2019	5/8/2020	206	no info
72		Division 2	05-Old-05-09-04	4/13/2020	5/9/2020	26	no info
73		Division 1	11-SE-01-01-001	5/6/2020	5/8/2020	2	no info
74		Division 3	F1-218-01	1/7/2020	5/9/2020	123	no info
75		Division 2	6-Annex-A6-14-05	11/27/2019	5/8/2020	163	no info
76		Division 3	F1-112-01	12/3/2019	5/9/2020	158	no info

77	Division 2	2-A4-14-05	9/18/2019	4/22/2020	217	no info
78	Division 3	G3-411-01	10/19/2019	5/10/2020	204	no info
79	Division 2	05-Old-05-06-07	10/17/2018	5/7/2020	568	no info
80	Division 3	F1-122-01	12/25/2019	5/10/2020	137	no info
81	Division 2	6-Annex-6-12-14	10/14/2019	5/7/2020	206	no info
82	Division 1	10-NW-03-02	10/2/2019	5/8/2020	219	no info
83	Division 2	05-Old-05-06-06	6/26/2019	5/7/2020	316	no info
84	Division 3	G1-221-01	2/5/2020	5/8/2020	93	no info
85	Division 1	10-NW-09-02	3/4/2020	5/9/2020	66	no info
86	Division 2	4-Old-04-09-07	3/17/2020	5/7/2020	51	no info
87	Division 2	5-Annex-A5-13-05	9/14/2019	5/7/2020	236	no info
88	Division 1	10-NW-04-002	1/22/2020	5/8/2020	107	no info
89	"CMU"	10NE	3/6/2020	4/7/2020	32	4/14/2020
90	Division 2	3-Old 03-03-02	2/23/2020	5/7/2020	74	no info
91	Division 1	10-NW-04-01	1/13/2020	5/9/2020	117	no info
92	Division 3	H1-107-01	2/21/2020	5/9/2020	78	no info
93	Division 1	10-NW-05-002	2/2/2020	5/8/2020	96	no info
94	Division 1	11-NW-12-01	5/6/2020	5/8/2020	2	no info
95	Division 2	5-Annex-A5-13-06	2/26/2020	5/7/2020	71	no info
96	Division 2	06-Annex-A6-14-14	3/4/2020	5/7/2020	64	no info
97	Division 2	4-Old-04-08-04	8/16/2019	5/7/2020	265	no info
98	Division 2	5-Annex A5-12-01	8/26/2019	5/7/2020	255	no info
99	Division 2	04-Old-04-02-07	3/4/2020	5/7/2020	64	no info
100	Division 1	10-SW-12-002	4/30/2020	5/8/2020	8	no info
101	Division 2	04-Old-04-05-05	1/15/2020	5/10/2020	116	no info
102	Division 2	04-Old-04-07-01	5/16/2019	5/7/2020	357	no info
103	Division 1	10-NE-01-002	12/13/2019	5/8/2020	147	no info
104	Division 1	04-SW-13-02	5/1/2020	5/8/2020	7	no info
105	Division 2	04-Old-04-05-07	8/14/2019	5/9/2020	269	no info
106	Division 2	05-Old-05-06-10	11/4/2019	5/7/2020	185	no info
107	Division 2	04-Old-04-05-06	12/4/2019	5/10/2020	158	no info

108	Division 2	6-Annex-A6-11-06	12/20/2019	5/8/2020	140	
109	Division 3	SEG-202-01	5/8/2020	5/9/2020	1	5/13/2020
110	Division 1	04-NE-06-002	6/11/2019	5/9/2020	333	no info
111	Division 1	04-SE-10-001	8/12/2019	5/8/2020	270	no info
112	Division 3	E1-208-01	3/3/2020	5/9/2020	67	
113	Division 2	04-Old-04-04-02	12/29/2019	5/7/2020	130	no info
114	Division 3	F1-213-01	2/27/2020	5/10/2020	73	no info
115	Division 2	5-Annex-A5-13-02	1/20/2020	5/7/2020	108	no info
116	Division 2	5-Annex A5-12-03	12/2/2019	5/7/2020	157	no info
117	Division 1	04-NE-04-T.O/C.O-001	10/17/2018	5/8/2020	569	no info
118	Division 1	10-SE-03-001	2/25/2020	5/8/2020	73	no info
119	Division 3	G3-309-01	11/20/2019	5/10/2020	172	
120	Division 2	5-Annex-A5-13-08	10/15/2019	5/8/2020	206	no info
121	Division 3	H1-129-01	1/11/2020	5/9/2020	119	no info
122	Division 3	H1-116-01	1/10/2020	5/9/2020	120	no info
123	Division 3	H3-318-01	12/20/2019	5/11/2020	143	no info
124	Division 3	E3-315-01	9/23/2019	5/9/2020	229	no info
125	Division 1	06-SE-11-001	3/22/2020	5/9/2020	48	no info
126	Division 2	04-Old-04-04-05	6/22/2019	5/7/2020	320	no info
127	Division 2	4-Annex-A4-14-11	12/3/2019	4/22/2020	141	no info
128	Division 1	10-NW-13-002	3/5/2020	5/8/2020	64	no info
129	Division 2	6-Annex-A6-13-14	3/10/2020	5/7/2020	58	no info
130	Division 3	F1-107-01	1/15/2020	5/10/2020	116	no info
131	Division 3	H1-227-01	11/19/2019	5/9/2020	172	no info
132	Division 1	10-NW-01-001	2/4/2020	5/8/2020	94	no info
133	Division 3	H1-206-01	1/24/2020	5/9/2020	106	no info
134	Division 3	E3-422-01	7/8/2019	5/9/2020	306	5/22/20 (with tether)
135	Division 2	5-Old-05-06-09	1/17/2020	5/7/2020	111	no info
136	Division 1	10-NW-11-02	1/7/2020	5/8/2020	122	no info
137	Division 3	E1-119-01	3/6/2020	5/9/2020	64	no info
138	Division 2	05-Old-05-05-02	2/14/2020	5/7/2020	83	no info
139	Division 3	H3-305-01	11/26/2019	4/29/2020	155	no info
140	Division 1	10-NE-10-001	3/16/2020	5/8/2020	53	no info
141	Division 3	H3-317-01	10/23/2019	4/24/2020	184	no info
142	Division 3	E3-322-01	3/5/2020	5/9/2020	65	no info

143	Unknown	Unknown		12/26/2019	5/9/2020	135	no info
144	Division 2	4-Old-04-05-03		12/24/2019	5/9/2020	137	no info
145	Division 1	4-NW-03-001		4/23/2020	5/8/2020	15	no info
146	Division 1	10-SW-02-01		10/8/2019	5/8/2020	213	no info
147	Division 3	E1-107-01		8/9/2019	5/9/2020	274	no info
148	"Unit Quarantine"	2-A4-14-14		3/19/2020	4/22/2020	34	5/4/2020 (with tether)
149	Division 3	H3-322-01		3/3/2020	4/27/2020	55	no info
150	Unknown (only in "Inmate Tracking spreadsheet")	Unknown		5/21/2020	5/26/2020	5	
151	Division 1	N/A		3/16/2020	5/7/2020	52	
152	Unknown	Unknown		1/2/2020	5/7/2020	126	
153	Division 3	G1-116-01		1/6/2020	5/10/2020	125	no info
154	Division 2	3-Old 03-02-08		2/13/2020	5/7/2020	84	
155	Division 3	G1-225-01		5/7/2020	5/9/2020	2	no info
156	Division 3	G3-319-01		1/30/2020	5/9/2020	100	no info
157	Division 2	5-Annex-A5-13-03		1/30/2020	5/7/2020	98	no info
158	Division 1	06-SW-07-002		4/21/2020	5/9/2020	18	no info
159	Division 1	10-NW-10-02		2/27/2020	5/8/2020	71	no info
160	Division 3	F1-229-01		2/8/2020	5/9/2020	91	no info
161	Division 3	F1-214-01		12/29/2019	5/9/2020	132	no info
162	Division 2	6-Old-06-05-02		3/18/2020	5/7/2020	50	no info
163	Division 2	5-Annex-A5-13-01		1/10/2020	5/7/2020	118	no info

164	Division 1	10-SW-01-001	2/20/2020	5/9/2020	79	no info
165	Division 3	H3-307-01	2/5/2020	5/7/2020	92	no info
166	Division 1	10NE-09-001	2/26/2020	5/8/2020	72	no info
167	Division 3	H3-312-01	10/25/2019	5/11/2020	199	no info
168	Division 3	E1-103-01	3/12/2020	5/9/2020	58	no info
169	Division 3	E3-303-01	3/17/2020	5/9/2020	53	no info
170	Division 3	H3-324-01	3/29/2019	4/6/2020	374	
171	Division 2	05Old-05-06-08	3/18/2018	5/7/2020	781	no info
172	Division 3	E1-125-01	2/20/2020	5/9/2020	79	no info
173	"Unit Quarantine"	1-5NW	4/24/2020	4/27/2020	3	4/27/2020 (with tether, before results)
174	Division 2	5-Old-05-06-02	9/2/2019	5/9/2020	250	no info
175	Division 3	H3-327-01	8/29/2019	4/27/2020	242	no info
176	Division 3	G3-425-01	1/15/2020	5/9/2020	115	no info
177	Division 2	05-Old-05-06-04	12/20/2019	5/7/2020	139	
178	Division 2 "Unit Quarantine"	2-A4-13-03	3/19/2020	4/22/2020	34	
179	"Unit Quarantine"	2-A4-14-11	3/8/2020	4/22/2020	45	
180	Division 2	05-Old-05-06-05	12/4/2019	5/7/2020	155	no info
181	Division 3	H1-118-01	6/21/2019	5/9/2020	323	no info
182	Division 3	G3-421-01	2/5/2020	5/9/2020	94	no info
183	Division 3	5-Annex-05-13-07	1/20/2020	5/7/2020	108	no info
184	Division 3	E1-218-01	2/28/2020	5/10/2020	72	no info
185	Division 2	6-Annex-A6-11-09	5/20/2019	5/7/2020	353	

186



Division 2

2-01d-02-05-04

5/9/2019

5/9/2020

366

no info

Total people tested
positive in jail who
Breakdown: were there for more
than 21 days: 169
(yellow)

Note that the 169/186 people who tested positive on this list are approximate, because the spreadsheets did not always provide complete or consistent information, multiple people have been released, etc. (see side notes)

Notes (if not released)

*Last updated: June 6, 2020

*Admission info
unavailable: not in "Inmate
Tracking" spreadsheet;
"date admitted" based on
Odyssey's report of
charges filed 4/29/2020

*Admission info
unavailable: not in "Inmate
Tracking" spreadsheet;
"date admitted" based on
Odyssey's report of
charges filed 5/7/2020

* [REDACTED] only shows up on the
"New View" tab of the "Inmate
Tracking" spreadsheet but not any
of the other sheets

re-tested 5/22, remains
positive
Tested "negative"
4/22/2020

Tested positive at Harper
Hospital; re-tested
5/21/2020 "negative"

re-tested positive
5/11/2020

re-tested 5/21 , remains
positive

*"New view" states DH initially tested 4/22 and re-tested 5/15 (remaining positive) while "GRS Data" states DH got positive antibody test results 5/7/2020 (not sure if he in fact tested 3 xs, calculated days according to earliest test date)

Retest refused
5/21/2020

*2 test dates listed: 5/7 and 5/9, calculated days according to 5/9, when he tested positive for antibodies

"re-tested 5/22, remains positive"

"tested positive, then re-tested negative"

re-tested 5/26/2020,
"results pending"

Re-tested 5/15/2020
"negative"

**Admission info
unavailable: not in "Inmate
Tracking" spreadsheet;
"date admitted" based on
Odyssey's report of
charges filed 12/26/2019*

**Details only in "New View"
spreadsheet*

*"New view" spreadsheet:
"Patient stated tested
positive at the
hospital"/Results pending
from 5/26/2020 test*

*Re-tested 5/28, "results
pending"*

**No details in "Covid-19
Results" spreadsheet*

**Admission info
unavailable: not in "Inmate
Tracking" spreadsheet;
"date admitted" based on
Odyssey's report of
charges filed 1/2/2020*

*"tested positive, then re-
tested negative"*

Tested "negative"
4/17/2020

Unclear: "New View"
reports 4/6/2020 results
"negative" next to note
"remains positive at day
14" - *not counted in
yellow total*)

"New view" spreadsheet
reports 4/13/2020
"negative" & 4/23/2020
"negative": re-tested
5/11/2020 "positive"

Retest refused
5/21/2020

Re-tested 5/15; remains
positive

Tested 4/22, re-tested
5/4, remains positive

re-tested 5/21, remains
positive

"New View" spreadsheet:
tested 4/13/2020
"negative," re-tested
5/9/2020
"negative"/"Covid-19
Results" spreadsheet: re-
tested 5/9/2020
"positive"

EXHIBIT C



Wayne County Jail - COVID

Practice Name	Name	Office Id	Birth Date	Provider	Test Code
Wayne County Jail		1707583	05/10/1996	LEVY, PHILLIP	COVID
Wayne County Jail		1751278	07/14/1973	LEVY, PHILLIP	COVID
Wayne County Jail		1819212	07/10/1978	LEVY, PHILLIP	COVID
Wayne County Jail		1796471	08/20/1966	LEVY, PHILLIP	COVID
Wayne County Jail		1789693	12/10/2001	LEVY, PHILLIP	COVID
Wayne County Jail		388517	06/07/1995	LEVY, PHILLIP	COVG
Wayne County Jail		1792576	01/01/1981	LEVY, PHILLIP	COVID
Wayne County Jail		178052	02/03/1967	LEVY, PHILLIP	COVID
Wayne County Jail		1720097	03/25/1996	LEVY, PHILLIP	COVID
Wayne County Jail		1826958	02/04/1997	LEVY, PHILLIP	COVID
Wayne County Jail		1819476	12/27/1997	LEVY, PHILLIP	COVID
Wayne County Jail		1748338	10/07/1999	LEVY, PHILLIP	COVID
Wayne County Jail		1802366	11/30/1984	LEVY, PHILLIP	COVID
Wayne County Jail		370468	10/02/1981	LEVY, PHILLIP	COVID
Wayne County Jail		1815450	10/02/2001	LEVY, PHILLIP	COVID
Wayne County Jail		344385	05/28/1989	LEVY, PHILLIP	COVID
Wayne County Jail		1824985	01/13/1996	LEVY, PHILLIP	COVG
Wayne County Jail		1727165	07/31/1992	LEVY, PHILLIP	COVID
Wayne County Jail		1796893	09/29/1996	LEVY, PHILLIP	COVID
Wayne County Jail		1730881	03/01/1998	LEVY, PHILLIP	COVG
Wayne County Jail		1800177	05/03/1997	LEVY, PHILLIP	COVID
Wayne County Jail		1795318	12/19/1996	LEVY, PHILLIP	COVID
Wayne County Jail		82934	12/30/1966	LEVY, PHILLIP	COVID
Wayne County Jail		1758844	08/30/1991	LEVY, PHILLIP	COVG
Wayne County Jail		312022	06/13/1988	LEVY, PHILLIP	COVID
Wayne County Jail		355713	02/26/1991	LEVY, PHILLIP	COVID
Wayne County Jail		1816362	04/01/1985	LEVY, PHILLIP	COVID
Wayne County Jail		1826979	03/23/1994	LEVY, PHILLIP	COVID
Wayne County Jail		323653	08/17/1987	LEVY, PHILLIP	COVID
Wayne County Jail		1746705	09/12/1994	LEVY, PHILLIP	COVG
Wayne County Jail		1810225	12/24/1993	LEVY, PHILLIP	COVID
Wayne County Jail		363896	07/02/1993	LEVY, PHILLIP	COVID

Wayne County Jail	163552	07/20/1977	LEVY, PHILLIP	COVID
Wayne County Jail	387399	06/24/1992	LEVY, PHILLIP	COVID
Wayne County Jail	410700	10/20/1995	LEVY, PHILLIP	COVG
Wayne County Jail	1813242	05/31/1993	LEVY, PHILLIP	COVID
Wayne County Jail	416478	04/30/1995	LEVY, PHILLIP	COVID
Wayne County Jail	405966	11/24/1987	LEVY, PHILLIP	COVID
Wayne County Jail	389521	01/31/1982	LEVY, PHILLIP	COVID
Wayne County Jail	1821870	08/10/2001	LEVY, PHILLIP	COVG
Wayne County Jail	298530	07/25/1987	LEVY, PHILLIP	COVID
Wayne County Jail	1826383	03/30/1983	LEVY, PHILLIP	COVID
Wayne County Jail	178805	08/24/1976	LEVY, PHILLIP	COVID
Wayne County Jail	333927	10/25/1989	LEVY, PHILLIP	COVID
Wayne County Jail	251818	07/20/1985	LEVY, PHILLIP	COVG
Wayne County Jail	1793818	01/07/1998	LEVY, PHILLIP	COVID
Wayne County Jail	138931	01/29/1980	LEVY, PHILLIP	COVID
Wayne County Jail	411700	06/28/1996	LEVY, PHILLIP	COVID
Wayne County Jail	397783	07/11/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1741853	02/07/1997	LEVY, PHILLIP	COVID
Wayne County Jail	210863	06/24/1966	LEVY, PHILLIP	COVID
Wayne County Jail	1721473	10/21/1999	LEVY, PHILLIP	COVID
Wayne County Jail	314995	12/15/1972	LEVY, PHILLIP	COVID
Wayne County Jail	361958	06/21/1991	LEVY, PHILLIP	COVID
Wayne County Jail	1822467	07/08/1999	LEVY, PHILLIP	COVID
Wayne County Jail	1826855	04/09/1992	LEVY, PHILLIP	COVID
Wayne County Jail	83935	07/25/1964	LEVY, PHILLIP	COVID
Wayne County Jail	122552	01/20/1979	LEVY, PHILLIP	COVID
Wayne County Jail	1737291	12/05/1985	LEVY, PHILLIP	COVID
Wayne County Jail	1820050	09/05/1988	LEVY, PHILLIP	COVID
Wayne County Jail	1826839	06/25/1996	LEVY, PHILLIP	COVID
Wayne County Jail	1826741	05/17/1993	LEVY, PHILLIP	COVG
Wayne County Jail	1800473	02/25/2002	LEVY, PHILLIP	COVID
Wayne County Jail	1801825	07/18/1973	LEVY, PHILLIP	COVID
Wayne County Jail	2018019549	07/17/1996	LEVY, PHILLIP	COVID
Wayne County Jail	150048	07/14/1948	LEVY, PHILLIP	COVID
Wayne County Jail	323931	10/10/1987	LEVY, PHILLIP	COVG
Wayne County Jail	324154	04/26/1988	LEVY, PHILLIP	COVID
Wayne County Jail	1826892	04/19/1990	LEVY, PHILLIP	COVID

Wayne County Jail	344582	03/02/1987	LEVY, PHILLIP	COVID
Wayne County Jail	1822120	02/25/2001	LEVY, PHILLIP	COVG
Wayne County Jail	1916067	05/12/1993	LEVY, PHILLIP	COVID
Wayne County Jail	311475	12/03/1973	LEVY, PHILLIP	COVID
Wayne County Jail	1796495	05/21/1962	LEVY, PHILLIP	COVID
Wayne County Jail	350809	09/11/1991	LEVY, PHILLIP	COVID
Wayne County Jail	1722466	04/14/1992	LEVY, PHILLIP	COVID
Wayne County Jail	1768638	01/01/2000	LEVY, PHILLIP	COVID
Wayne County Jail	78772	07/01/1972	LEVY, PHILLIP	COVID
Wayne County Jail	229704	09/07/1983	LEVY, PHILLIP	COVID
Wayne County Jail	1822508	09/30/1986	LEVY, PHILLIP	COVID
Wayne County Jail	52767	03/27/1972	LEVY, PHILLIP	COVID
Wayne County Jail	182675	02/15/1990	LEVY, PHILLIP	COVID
Wayne County Jail	416805	03/03/1996	LEVY, PHILLIP	COVG
Wayne County Jail	1825987	09/06/1994	LEVY, PHILLIP	COVG
Wayne County Jail	283638	05/04/1986	LEVY, PHILLIP	COVID
Wayne County Jail	326664	12/08/1988	LEVY, PHILLIP	COVID
Wayne County Jail	365422	02/14/1991	LEVY, PHILLIP	COVID
Wayne County Jail	279762	04/24/1975	LEVY, PHILLIP	COVID
Wayne County Jail	400549	05/04/1994	LEVY, PHILLIP	COVID
Wayne County Jail	353831	01/02/1991	LEVY, PHILLIP	COVID
Wayne County Jail	1826849	03/24/1983	LEVY, PHILLIP	COVID
Wayne County Jail	1794520	02/20/1985	LEVY, PHILLIP	COVID
Wayne County Jail	307393	06/18/1980	LEVY, PHILLIP	COVID
Wayne County Jail	1770571	11/12/1978	LEVY, PHILLIP	COVG
Wayne County Jail	320504	07/13/1988	LEVY, PHILLIP	COVID
Wayne County Jail	137292	01/28/1979	LEVY, PHILLIP	COVG
Wayne County Jail	1826953	08/17/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1809629	02/06/1984	LEVY, PHILLIP	COVID
Wayne County Jail	1826729	05/13/1984	LEVY, PHILLIP	COVID
Wayne County Jail	8072	04/30/1969	LEVY, PHILLIP	COVG
Wayne County Jail	1826443	11/27/1989	LEVY, PHILLIP	COVID
Wayne County Jail	357121	09/03/1991	LEVY, PHILLIP	COVID
Wayne County Jail	1783945	04/21/1975	LEVY, PHILLIP	COVID
Wayne County Jail	1810248	01/08/1996	LEVY, PHILLIP	COVID
Wayne County Jail	1750799	04/28/1996	LEVY, PHILLIP	COVG
Wayne County Jail	303828	05/29/1969	LEVY, PHILLIP	COVID

Wayne County Jail	1782438	05/30/1995	LEVY, PHILLIP	COVID
Wayne County Jail	386694	01/01/1992	LEVY, PHILLIP	COVID
Wayne County Jail	1822815	08/25/2002	LEVY, PHILLIP	COVID
Wayne County Jail	1725055	07/12/1998	LEVY, PHILLIP	COVID
Wayne County Jail		10/27/1982	LEVY, PHILLIP	COVID
Wayne County Jail	332560	10/27/1989	LEVY, PHILLIP	COVID
Wayne County Jail	396967	08/01/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1815510	04/09/1967	LEVY, PHILLIP	COVID
Wayne County Jail	1766724	10/04/1991	LEVY, PHILLIP	COVID
Wayne County Jail	288696	05/14/1984	LEVY, PHILLIP	COVID
Wayne County Jail	1822436	10/01/1998	LEVY, PHILLIP	COVID
Wayne County Jail	1820638	08/29/1985	LEVY, PHILLIP	COVID
Wayne County Jail	1815191	07/06/1977	LEVY, PHILLIP	COVID
Wayne County Jail	1810142	02/09/2000	LEVY, PHILLIP	COVID
Wayne County Jail	1722080	04/01/1999	LEVY, PHILLIP	COVID
Wayne County Jail	1826658	09/12/1998	LEVY, PHILLIP	COVID
Wayne County Jail	1816352	03/25/1967	LEVY, PHILLIP	COVID
Wayne County Jail	1825611	08/04/1999	LEVY, PHILLIP	COVID
Wayne County Jail	1820413	08/12/2000	LEVY, PHILLIP	COVID
Wayne County Jail	19371	05/03/1972	LEVY, PHILLIP	COVID
Wayne County Jail	1742023	06/10/1995	LEVY, PHILLIP	COVID
Wayne County Jail	1826977	05/04/1987	LEVY, PHILLIP	COVID
Wayne County Jail	339098	12/01/1990	LEVY, PHILLIP	COVID
Wayne County Jail	1826911	12/11/1993	LEVY, PHILLIP	COVG
Wayne County Jail	1826963	07/08/1974	LEVY, PHILLIP	COVID
Wayne County Jail	415316	05/01/1995	LEVY, PHILLIP	COVID
Wayne County Jail	405065	05/14/1994	LEVY, PHILLIP	COVID
Wayne County Jail	161793	04/17/1975	LEVY, PHILLIP	COVG
Wayne County Jail	1821053	11/11/2000	LEVY, PHILLIP	COVG
Wayne County Jail	1809938	07/03/1982	LEVY, PHILLIP	COVG
Wayne County Jail	284652	04/07/1987	LEVY, PHILLIP	COVG
Wayne County Jail	1735123	03/16/1996	LEVY, PHILLIP	COVG
Wayne County Jail	1821130	05/07/1996	LEVY, PHILLIP	COVID
Wayne County Jail	187416	01/09/1981	LEVY, PHILLIP	COVID
Wayne County Jail	1730975	02/16/1973	LEVY, PHILLIP	COVID
Wayne County Jail	1717094	04/21/1999	LEVY, PHILLIP	COVID
Wayne County Jail	1801589	06/22/2000	LEVY, PHILLIP	COVID

Wayne County Jail	264655	06/02/1960	LEVY, PHILLIP	COVG
Wayne County Jail	1813595	05/07/1944	LEVY, PHILLIP	COVID
Wayne County Jail	1824308	06/26/1986	LEVY, PHILLIP	COVID
Wayne County Jail	1826960	03/27/1986	LEVY, PHILLIP	COVID
Wayne County Jail	1815167	02/27/1998	LEVY, PHILLIP	COVID
Wayne County Jail	255419	10/22/1969	LEVY, PHILLIP	COVID
Wayne County Jail	351489	12/03/1991	LEVY, PHILLIP	COVID
Wayne County Jail	1768625	03/20/1991	LEVY, PHILLIP	COVID
Wayne County Jail	392176	11/14/1995	LEVY, PHILLIP	COVID
Wayne County Jail	1740231	09/19/1960	LEVY, PHILLIP	COVID
Wayne County Jail	90587	12/14/1976	LEVY, PHILLIP	COVID
Wayne County Jail	1823567	10/21/1997	LEVY, PHILLIP	COVID
Wayne County Jail	1763672	04/27/1977	LEVY, PHILLIP	COVID
Wayne County Jail	1763290	10/21/1982	LEVY, PHILLIP	COVG
Wayne County Jail	396599	07/09/1959	LEVY, PHILLIP	COVID
Wayne County Jail	1826395	08/13/1988	LEVY, PHILLIP	COVID
Wayne County Jail	1710701	04/21/1999	LEVY, PHILLIP	COVID
Wayne County Jail	240699	11/28/1981	LEVY, PHILLIP	COVID
Wayne County Jail	1742214	03/09/1993	LEVY, PHILLIP	COVID
Wayne County Jail	373885	03/19/1990	LEVY, PHILLIP	COVID
Wayne County Jail	164471	04/29/1969	LEVY, PHILLIP	COVID
Wayne County Jail	1826787	07/01/1980	LEVY, PHILLIP	COVID
Wayne County Jail	291916	11/25/1964	LEVY, PHILLIP	COVID
Wayne County Jail	358803	09/21/1968	LEVY, PHILLIP	COVID
Wayne County Jail	1815440	06/04/1996	LEVY, PHILLIP	COVID
Wayne County Jail	239243	04/15/1982	LEVY, PHILLIP	COVID
Wayne County Jail	75817	02/22/1971	LEVY, PHILLIP	COVID
Wayne County Jail	374376	08/07/1990	LEVY, PHILLIP	COVID
Wayne County Jail	298671	06/14/1986	LEVY, PHILLIP	COVG
Wayne County Jail	394398	06/05/1994	LEVY, PHILLIP	COVID
Wayne County Jail	329033	04/13/1972	LEVY, PHILLIP	COVID
Wayne County Jail	64808	08/26/1972	LEVY, PHILLIP	COVID
Wayne County Jail	1739388	01/14/1996	LEVY, PHILLIP	COVG
Wayne County Jail	1775019	01/04/2001	LEVY, PHILLIP	COVID
Wayne County Jail	207038	04/24/1982	LEVY, PHILLIP	COVID
Wayne County Jail	301448	04/11/1984	LEVY, PHILLIP	COVG
Wayne County Jail	1808229	05/05/1997	LEVY, PHILLIP	COVID

Wayne County Jail	1824328	08/18/1967	LEVY, PHILLIP	COVID
Wayne County Jail	324519	08/24/1981	LEVY, PHILLIP	COVID
Wayne County Jail	171603	11/21/1977	LEVY, PHILLIP	COVID
Wayne County Jail	300192	03/18/1989	LEVY, PHILLIP	COVID
Wayne County Jail	385857	10/04/1994	LEVY, PHILLIP	COVID
Wayne County Jail	242073	08/11/1983	LEVY, PHILLIP	COVID
Wayne County Jail	81348	01/21/1948	LEVY, PHILLIP	COVID
Wayne County Jail	1738703	06/01/1995	LEVY, PHILLIP	COVG
Wayne County Jail	1815299	02/27/1978	LEVY, PHILLIP	COVID
Wayne County Jail	58635	11/04/1964	LEVY, PHILLIP	COVID
Wayne County Jail	1758673	07/05/1997	LEVY, PHILLIP	COVID
Wayne County Jail	1824943	07/19/1997	LEVY, PHILLIP	COVG
Wayne County Jail	1818018	02/14/1985	LEVY, PHILLIP	COVID
Wayne County Jail	374854	08/17/1989	LEVY, PHILLIP	COVID
Wayne County Jail	1801934	07/26/1977	LEVY, PHILLIP	COVID
Wayne County Jail	5248	04/15/1975	LEVY, PHILLIP	COVID
Wayne County Jail	232085	07/08/1968	LEVY, PHILLIP	COVG
Wayne County Jail	358288	03/18/1992	LEVY, PHILLIP	COVID
Wayne County Jail	180917	09/25/1999	LEVY, PHILLIP	COVID
Wayne County Jail	1824788	03/17/1999	LEVY, PHILLIP	COVID
Wayne County Jail	17448812	04/21/1988	LEVY, PHILLIP	COVID
Wayne County Jail	206879	02/24/1981	LEVY, PHILLIP	COVID
Wayne County Jail	402306	09/12/1995	LEVY, PHILLIP	COVID
Wayne County Jail	1826857	09/14/1975	LEVY, PHILLIP	COVID
Wayne County Jail	1825918	10/19/1985	LEVY, PHILLIP	COVID
Wayne County Jail	407733	01/02/1992	LEVY, PHILLIP	COVID
Wayne County Jail	1821930	12/21/2002	LEVY, PHILLIP	COVID
Wayne County Jail	336704	08/29/1990	LEVY, PHILLIP	COVID
Wayne County Jail	56477	09/30/1969	LEVY, PHILLIP	COVID
Wayne County Jail	262675	07/18/1985	LEVY, PHILLIP	COVID
Wayne County Jail	382370	02/05/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1769604	07/15/1966	LEVY, PHILLIP	COVID
Wayne County Jail	145117	05/30/1979	LEVY, PHILLIP	COVID
Wayne County Jail	276690	03/14/1987	LEVY, PHILLIP	COVG
Wayne County Jail	309172	04/19/1989	LEVY, PHILLIP	COVID
Wayne County Jail	1824013	07/27/1990	LEVY, PHILLIP	COVID
Wayne County Jail	1824309	01/01/1981	LEVY, PHILLIP	COVID

Wayne County Jail	240797	03/18/1986	JACKSON, ADRIA	COVID
Wayne County Jail	1796291	04/14/1994	LEVY, PHILLIP	COVG
Wayne County Jail	1795834	05/01/1993	LEVY, PHILLIP	COVID
Wayne County Jail	390314	12/09/1988	LEVY, PHILLIP	COVID
Wayne County Jail	93279	05/18/1962	LEVY, PHILLIP	COVID
Wayne County Jail	57664	02/03/1975	LEVY, PHILLIP	COVID
Wayne County Jail	1700503	01/30/1980	LEVY, PHILLIP	COVID
Wayne County Jail	1823328	05/29/2000	LEVY, PHILLIP	COVID
Wayne County Jail	378659	07/23/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1826788	04/05/1997	LEVY, PHILLIP	COVID
Wayne County Jail	180599	08/02/1981	LEVY, PHILLIP	COVID
Wayne County Jail	314329	01/04/1984	LEVY, PHILLIP	COVID
Wayne County Jail	1817692	02/19/2000	LEVY, PHILLIP	COVG
Wayne County Jail	1747837	10/24/1992	LEVY, PHILLIP	COVG
Wayne County Jail	202263	05/05/1979	LEVY, PHILLIP	COVID
Wayne County Jail	391684	08/08/1995	LEVY, PHILLIP	COVID
Wayne County Jail	358492	03/02/1991	LEVY, PHILLIP	COVID
Wayne County Jail	393950	01/07/1995	LEVY, PHILLIP	COVID
Wayne County Jail	199204	12/09/1960	LEVY, PHILLIP	COVID
Wayne County Jail	408678	07/02/1992	LEVY, PHILLIP	COVG
Wayne County Jail	1822046	04/28/2001	LEVY, PHILLIP	COVG
Wayne County Jail	206011	07/27/1981	LEVY, PHILLIP	COVID
Wayne County Jail	1706266	12/17/1997	LEVY, PHILLIP	COVID
Wayne County Jail	1818595	08/19/2001	LEVY, PHILLIP	COVID
Wayne County Jail	391622	09/09/1994	LEVY, PHILLIP	COVID
Wayne County Jail	310665	02/11/1988	LEVY, PHILLIP	COVID
Wayne County Jail	254210	07/29/1985	LEVY, PHILLIP	COVID
Wayne County Jail	385514	07/26/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1826042	04/30/1999	LEVY, PHILLIP	COVG
Wayne County Jail	1809904	10/27/2001	LEVY, PHILLIP	COVID
Wayne County Jail	273991	10/19/1981	LEVY, PHILLIP	COVID
Wayne County Jail	1814532	06/13/1999	LEVY, PHILLIP	COVID
Wayne County Jail	172655	09/13/1981	LEVY, PHILLIP	COVG
Wayne County Jail	221038	05/16/1983	LEVY, PHILLIP	COVID
Wayne County Jail	1826923	07/07/1989	LEVY, PHILLIP	COVID
Wayne County Jail	208714	03/16/1984	LEVY, PHILLIP	COVID
Wayne County Jail	1826801	06/27/1965	LEVY, PHILLIP	COVID

Wayne County Jail	389828	05/21/1995	LEVY, PHILLIP	COVID
Wayne County Jail	1826976	11/16/1991	LEVY, PHILLIP	COVID
Wayne County Jail	147574	07/17/1978	LEVY, PHILLIP	COVID
Wayne County Jail	326033	08/19/1983	LEVY, PHILLIP	COVID
Wayne County Jail	17-3195	02/09/1983	LEVY, PHILLIP	COVG
Wayne County Jail	410413	01/15/1996	LEVY, PHILLIP	COVID
Wayne County Jail	244516	08/12/1985	LEVY, PHILLIP	COVID
Wayne County Jail	413182	12/12/1991	LEVY, PHILLIP	COVID
Wayne County Jail	393289	03/05/1995	LEVY, PHILLIP	COVID
Wayne County Jail	199274	04/24/1978	LEVY, PHILLIP	COVID
Wayne County Jail	99830	02/10/1967	LEVY, PHILLIP	COVID
Wayne County Jail	257591	04/28/1986	LEVY, PHILLIP	COVID
Wayne County Jail	1825496	12/13/1998	LEVY, PHILLIP	COVID
Wayne County Jail	1824967	04/25/1951	LEVY, PHILLIP	COVID
Wayne County Jail	348180	04/11/1992	LEVY, PHILLIP	COVID
Wayne County Jail	236685	03/06/1973	LEVY, PHILLIP	COVID
Wayne County Jail	382	06/05/1992	LEVY, PHILLIP	COVID
Wayne County Jail	211417	05/06/1981	LEVY, PHILLIP	COVID
Wayne County Jail	169493	02/08/1978	LEVY, PHILLIP	COVID
Wayne County Jail	198999	10/31/1971	LEVY, PHILLIP	COVID
Wayne County Jail	1817849	03/31/2000	LEVY, PHILLIP	COVG
Wayne County Jail	68527	12/04/1971	LEVY, PHILLIP	COVID
Wayne County Jail	1820602	08/18/1983	LEVY, PHILLIP	COVID
Wayne County Jail	360356	12/27/1988	LEVY, PHILLIP	COVID
Wayne County Jail	400421	08/28/1988	LEVY, PHILLIP	COVG
Wayne County Jail	1800205	02/25/1981	LEVY, PHILLIP	COVID
Wayne County Jail	1806592	03/18/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1824579	02/07/1993	LEVY, PHILLIP	COVID
Wayne County Jail	400437	04/18/1997	LEVY, PHILLIP	COVID
Wayne County Jail	1792754	01/21/1999	LEVY, PHILLIP	COVG
Wayne County Jail	381369	01/07/1991	LEVY, PHILLIP	COVG
Wayne County Jail	378497	09/25/1990	LEVY, PHILLIP	COVID
Wayne County Jail	1810847	08/31/1997	LEVY, PHILLIP	COVID
Wayne County Jail	394798	08/26/1995	LEVY, PHILLIP	COVID
Wayne County Jail	249322	01/02/1986	LEVY, PHILLIP	COVID
Wayne County Jail	1821185	01/21/1967	LEVY, PHILLIP	COVID
Wayne County Jail	165897	07/29/1969	LEVY, PHILLIP	COVID

Wayne County Jail	1717696	04/07/1999	LEVY, PHILLIP	COVID
Wayne County Jail	193195	06/26/1964	LEVY, PHILLIP	COVID
Wayne County Jail	196324	07/01/1964	LEVY, PHILLIP	COVID
Wayne County Jail	1811615	10/30/1993	LEVY, PHILLIP	COVID
Wayne County Jail	153253	09/09/1971	LEVY, PHILLIP	COVID
Wayne County Jail	1708775	03/16/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1741755	06/09/1998	LEVY, PHILLIP	COVG
Wayne County Jail	1826859	06/15/2001	LEVY, PHILLIP	COVID
Wayne County Jail	1826983	04/04/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1816604	11/10/1999	LEVY, PHILLIP	COVID
Wayne County Jail	18027202	01/21/1989	LEVY, PHILLIP	COVID
Wayne County Jail	399464	11/28/1990	LEVY, PHILLIP	COVID
Wayne County Jail	257772	01/05/1986	LEVY, PHILLIP	COVID
Wayne County Jail	142149	07/24/1978	LEVY, PHILLIP	COVID
Wayne County Jail	1823898	03/10/1999	LEVY, PHILLIP	COVID
Wayne County Jail	202907	05/11/1977	LEVY, PHILLIP	COVG
Wayne County Jail	311264	11/13/1985	LEVY, PHILLIP	COVID
Wayne County Jail	105889	08/28/1958	LEVY, PHILLIP	COVID
Wayne County Jail	265608	05/30/1983	LEVY, PHILLIP	COVID
Wayne County Jail	391893	07/10/1994	LEVY, PHILLIP	COVID
Wayne County Jail	390803	05/17/1995	LEVY, PHILLIP	COVID
Wayne County Jail	291937	12/07/1977	LEVY, PHILLIP	COVID
Wayne County Jail	329429	02/23/1984	LEVY, PHILLIP	COVID
Wayne County Jail	404552	07/10/1954	LEVY, PHILLIP	COVID
Wayne County Jail	276431	10/24/1985	LEVY, PHILLIP	COVID
Wayne County Jail	369794	10/01/1992	LEVY, PHILLIP	COVID
Wayne County Jail	265070	08/21/1982	LEVY, PHILLIP	COVID
Wayne County Jail	PLEVY	07/04/2002	LEVY, PHILLIP	COVID
Wayne County Jail	2018006114	08/26/1994	LEVY, PHILLIP	COVG
Wayne County Jail	400175	02/28/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1806514	04/11/1989	LEVY, PHILLIP	COVID
Wayne County Jail	1801406	02/02/1970	LEVY, PHILLIP	COVG
Wayne County Jail	1761846	04/17/1979	LEVY, PHILLIP	COVG
Wayne County Jail	1710608	05/06/1992	LEVY, PHILLIP	COVID
Wayne County Jail	312230	05/15/1988	LEVY, PHILLIP	COVID
Wayne County Jail	1810649	12/01/1998	LEVY, PHILLIP	COVID
Wayne County Jail	250575	01/18/1984	LEVY, PHILLIP	COVG

Wayne County Jail	219294	03/03/1981	LEVY, PHILLIP	COVID
Wayne County Jail	399134	07/01/1995	LEVY, PHILLIP	COVID
Wayne County Jail	361657	02/28/1964	LEVY, PHILLIP	COVG
Wayne County Jail	1816800	01/04/1993	LEVY, PHILLIP	COVID
Wayne County Jail	337730	03/14/1984	LEVY, PHILLIP	COVG
Wayne County Jail	213849	11/28/1983	LEVY, PHILLIP	COVID
Wayne County Jail	403101	06/07/1994	LEVY, PHILLIP	COVID
Wayne County Jail	389558	12/21/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1822122	04/08/1986	LEVY, PHILLIP	COVID
Wayne County Jail	1744420	03/26/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1779770	10/01/1996	LEVY, PHILLIP	COVG
Wayne County Jail	2583030	03/22/1964	LEVY, PHILLIP	COVID
Wayne County Jail	339450	05/30/1985	LEVY, PHILLIP	COVID
Wayne County Jail	1812865	01/25/1991	LEVY, PHILLIP	COVID
Wayne County Jail	3478452	08/01/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1823917	11/03/1990	LEVY, PHILLIP	COVID
Wayne County Jail	1811854	10/25/1998	LEVY, PHILLIP	COVID
Wayne County Jail	195180	11/12/1965	LEVY, PHILLIP	COVG
Wayne County Jail	265790	02/25/1953	LEVY, PHILLIP	COVID
Wayne County Jail	393799	05/23/1976	LEVY, PHILLIP	COVID
Wayne County Jail	180639	08/04/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1817934	08/11/2001	LEVY, PHILLIP	COVID
Wayne County Jail	366062	07/22/1982	LEVY, PHILLIP	COVID
Wayne County Jail	1815078	09/18/1980	LEVY, PHILLIP	COVID
Wayne County Jail	390145	11/17/1993	LEVY, PHILLIP	COVID
Wayne County Jail	1822524	10/13/1990	LEVY, PHILLIP	COVID
Wayne County Jail	1796254	02/22/1997	LEVY, PHILLIP	COVID
Wayne County Jail	1712785	03/23/1993	LEVY, PHILLIP	COVG
Wayne County Jail	1727930	08/21/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1752634	04/16/1991	LEVY, PHILLIP	COVID
Wayne County Jail	250554	12/25/1962	LEVY, PHILLIP	COVID
Wayne County Jail	307572	06/24/1965	LEVY, PHILLIP	COVID
Wayne County Jail	1817147	08/03/1989	LEVY, PHILLIP	COVID
Wayne County Jail	251755	07/16/2000	LEVY, PHILLIP	COVID
Wayne County Jail	1824013	10/21/1984	LEVY, PHILLIP	COVID
Wayne County Jail	402944	02/26/2000	LEVY, PHILLIP	COVID
Wayne County Jail		01/12/1991	LEVY, PHILLIP	COVID

Wayne County Jail	1659427	06/24/1996	LEVY, PHILLIP	COVID
Wayne County Jail	1699866	01/26/1998	LEVY, PHILLIP	COVID
Wayne County Jail	226018	09/13/1979	LEVY, PHILLIP	COVID
Wayne County Jail	167687	10/14/1979	LEVY, PHILLIP	COVID
Wayne County Jail	18237087	01/11/1998	LEVY, PHILLIP	COVID
Wayne County Jail	1820410	08/31/2002	LEVY, PHILLIP	COVG
Wayne County Jail	319289	07/04/1969	LEVY, PHILLIP	COVID
Wayne County Jail	1823705	10/27/1993	LEVY, PHILLIP	COVID
Wayne County Jail	320235	04/14/1960	LEVY, PHILLIP	COVID
Wayne County Jail	411322	12/11/1992	LEVY, PHILLIP	COVID
Wayne County Jail	1826850	09/03/1987	LEVY, PHILLIP	COVG
Wayne County Jail	378772	04/12/1993	LEVY, PHILLIP	COVID
Wayne County Jail	238084	03/24/1980	LEVY, PHILLIP	COVID
Wayne County Jail	191082	11/11/1980	LEVY, PHILLIP	COVID
Wayne County Jail	256105	10/20/1979	LEVY, PHILLIP	COVID
Wayne County Jail	192620	02/20/1981	LEVY, PHILLIP	COVID
Wayne County Jail	1826656	10/01/2002	LEVY, PHILLIP	COVG
Wayne County Jail	181870	03/05/1973	LEVY, PHILLIP	COVID
Wayne County Jail	263613	04/15/1984	LEVY, PHILLIP	COVID
Wayne County Jail	145461	06/24/1960	LEVY, PHILLIP	COVID
Wayne County Jail	1823058	02/22/1994	LEVY, PHILLIP	COVID
Wayne County Jail	1825928	05/13/1979	LEVY, PHILLIP	COVID
Wayne County Jail	171222	06/30/1975	KELDIE, DR	COVID
Wayne County Jail	53028	10/10/1963	LEVY, PHILLIP	COVID
Wayne County Jail	278750	04/29/1964	LEVY, PHILLIP	COVID
Wayne County Jail	1826580	05/22/1970	LEVY, PHILLIP	COVID
Wayne County Jail	410041	11/07/1997	LEVY, PHILLIP	COVID
Wayne County Jail	264983	03/01/1973	LEVY, PHILLIP	COVID
Wayne County Jail	364856	05/25/1992	LEVY, PHILLIP	COVID
Wayne County Jail	1792118	02/13/1999	LEVY, PHILLIP	COVID
Wayne County Jail	153613	08/26/1978	LEVY, PHILLIP	COVG
Wayne County Jail	1826237	03/12/1972	LEVY, PHILLIP	COVID
Wayne County Jail	333552	10/03/1996	LEVY, PHILLIP	COVID
Wayne County Jail	327509	04/28/1991	LEVY, PHILLIP	COVID
Wayne County Jail	412745	07/20/1989	LEVY, PHILLIP	COVID
Wayne County Jail	339757	11/14/1994	LEVY, PHILLIP	COVG
Wayne County Jail		12/15/1961	LEVY, PHILLIP	COVID

Wayne County Jail	163431	10/16/1968	LEVY, PHILLIP	COVID
Wayne County Jail	380467	06/20/1990	LEVY, PHILLIP	COVID
Wayne County Jail	120856	06/02/1977	LEVY, PHILLIP	COVID
Wayne County Jail	398678	06/19/1986	LEVY, PHILLIP	COVG
Wayne County Jail	1825914	01/16/1999	LEVY, PHILLIP	COVID
Wayne County Jail	1801292	06/12/1993	LEVY, PHILLIP	COVID
Wayne County Jail	89898	04/15/1977	LEVY, PHILLIP	COVG
Wayne County Jail	1804773	10/20/2000	LEVY, PHILLIP	COVID
Wayne County Jail	183051	03/25/1968	LEVY, PHILLIP	COVID
Wayne County Jail	393124	07/16/1990	LEVY, PHILLIP	COVG
Wayne County Jail	1821024	08/22/1963	LEVY, PHILLIP	COVID
Wayne County Jail	146193	04/10/1980	LEVY, PHILLIP	COVG
Wayne County Jail	191532	10/03/2002	LEVY, PHILLIP	COVID
Wayne County Jail	415191	06/30/1980	LEVY, PHILLIP	COVID
Wayne County Jail	66368	08/12/1998	LEVY, PHILLIP	COVID
Wayne County Jail	1821152	04/23/1959	LEVY, PHILLIP	COVID
Wayne County Jail	1745301	04/04/1988	LEVY, PHILLIP	COVID
Wayne County Jail	1814538	10/20/1996	LEVY, PHILLIP	COVID
Wayne County Jail	1816926	05/17/1997	LEVY, PHILLIP	COVID
Wayne County Jail	1744190	02/09/1993	LEVY, PHILLIP	COVID
Wayne County Jail	133146	02/11/1998	LEVY, PHILLIP	COVID
Wayne County Jail	1826883	01/16/1961	LEVY, PHILLIP	COVID
Wayne County Jail	1732666	03/03/1988	LEVY, PHILLIP	COVID
Wayne County Jail	280047	09/04/1989	LEVY, PHILLIP	COVID
Wayne County Jail	1807298	02/22/1977	LEVY, PHILLIP	COVID
Wayne County Jail	325919	05/01/2001	LEVY, PHILLIP	COVG
Wayne County Jail	1805034	01/30/1979	LEVY, PHILLIP	COVID
Wayne County Jail	1826907	01/07/1955	LEVY, PHILLIP	COVID
Wayne County Jail	386691	10/09/2001	LEVY, PHILLIP	COVID
Wayne County Jail	108363	06/24/1994	LEVY, PHILLIP	COVID
Wayne County Jail	402503	05/02/1973	LEVY, PHILLIP	COVID
Wayne County Jail	221407	08/13/1961	LEVY, PHILLIP	COVID
Wayne County Jail	266995	12/13/1980	KELDIE, DR	COVID
Wayne County Jail	402475	08/08/1985	LEVY, PHILLIP	COVID
Wayne County Jail	396060	06/26/1996	LEVY, PHILLIP	COVID
Wayne County Jail	1789226	07/21/1982	LEVY, PHILLIP	COVG
Wayne County Jail		12/29/1954	LEVY, PHILLIP	COVID

Wayne County Jail	1814970	09/26/1989	LEVY, PHILLIP	COVID
Wayne County Jail	1815565	01/19/1979	LEVY, PHILLIP	COVID
Wayne County Jail	325588	03/29/1975	LEVY, PHILLIP	COVID
Wayne County Jail	403867	11/24/1979	LEVY, PHILLIP	COVID
Wayne County Jail	86314	03/14/1972	LEVY, PHILLIP	COVID
Wayne County Jail	306728	08/22/1973	LEVY, PHILLIP	COVID
Wayne County Jail	416234	02/20/1989	LEVY, PHILLIP	COVID
Wayne County Jail	242965	08/24/1965	LEVY, PHILLIP	COVID
Wayne County Jail	084494	12/14/1968	LEVY, PHILLIP	COVID
Wayne County Jail	1710815	06/08/1970	LEVY, PHILLIP	COVID
Wayne County Jail	401219	12/17/1998	LEVY, PHILLIP	COVID
Wayne County Jail	323815	09/17/1993	LEVY, PHILLIP	COVID
Wayne County Jail	209229	12/31/1988	LEVY, PHILLIP	COVG
Wayne County Jail	1625075	04/26/1981	LEVY, PHILLIP	COVID
Wayne County Jail	1822810	03/25/1988	LEVY, PHILLIP	COVG
Wayne County Jail	390006	01/11/1982	LEVY, PHILLIP	COVID
Wayne County Jail	1802612	04/15/1994	LEVY, PHILLIP	COVID
Wayne County Jail	406076	08/28/1997	LEVY, PHILLIP	COVG
Wayne County Jail	226573	05/04/1977	LEVY, PHILLIP	COVID
Wayne County Jail	1809666	05/13/1984	LEVY, PHILLIP	COVID
Wayne County Jail	169776	02/05/1970	LEVY, PHILLIP	COVID
Wayne County Jail	1784070	12/20/1979	LEVY, PHILLIP	COVID
Wayne County Jail	394208	11/30/1983	LEVY, PHILLIP	COVID
Wayne County Jail	1769831	05/26/1973	LEVY, PHILLIP	COVID
Wayne County Jail	1820545	12/24/1997	KELDIE, DR	COVID
Wayne County Jail	405572	11/29/1997	LEVY, PHILLIP	COVID
Wayne County Jail	1822247	04/26/1997	LEVY, PHILLIP	COVID
Wayne County Jail	157450	07/27/1991	LEVY, PHILLIP	COVID
Wayne County Jail	1737638	06/17/1979	LEVY, PHILLIP	COVID
Wayne County Jail	1826989	12/10/1995	LEVY, PHILLIP	COVID
Wayne County Jail	130243	08/13/1994	LEVY, PHILLIP	COVID
Wayne County Jail	239973	12/17/1979	LEVY, PHILLIP	COVID
Wayne County Jail	1761899	06/22/1984	LEVY, PHILLIP	COVG
Wayne County Jail	410380	02/10/1992	LEVY, PHILLIP	COVID
Wayne County Jail	387067	11/12/1968	LEVY, PHILLIP	COVID
Wayne County Jail	1738177	11/18/1993	LEVY, PHILLIP	COVID
Wayne County Jail		10/31/1999	LEVY, PHILLIP	COVID

Test Desc	Result	Coll Date	Coll Time
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020	10:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020	09:40:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020	09:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	09:00:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020	16:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020	11:40:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	10:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	09:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	10:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	10:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020	09:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020	11:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020	08:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020	10:36:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	10:45:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020	16:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020	09:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020	08:25:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020	10:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020	10:06:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020	10:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020	09:15:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020	10:36:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020	09:50:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	10:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020	09:32:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	08:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020	08:57:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020	11:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020	10:22:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020	10:48:00

COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:04:00
COVID SARS-COV-2 IGG	POSITIVE	05/08/2020 10:37:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 10:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:18:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 08:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:27:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 16:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:17:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 09:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:07:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 11:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:48:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:51:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:36:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:08:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:14:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:40:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 09:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:54:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:02:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 18:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:45:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:45:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:43:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:25:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 11:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:38:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:24:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:22:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 09:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:48:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 17:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:46:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:09:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:27:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:37:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:12:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 05:08:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:37:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:36:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:52:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:46:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:22:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:11:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:55:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:38:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:05:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:31:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:45:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:18:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 10:18:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 14:36:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:36:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:09:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:20:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 10:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:54:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:02:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 13:43:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:16:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:17:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:22:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 14:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:01:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:17:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:43:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:32:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:58:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:46:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:08:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 08:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:08:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:36:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:24:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:19:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 09:49:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:47:00
COVID SARS-COV-2 IGG	POSITIVE	05/07/2020 10:41:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:46:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:08:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 11:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:26:00

COVID SARS-COV-2 IGG	POSITIVE	05/08/2020 10:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:09:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:36:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:09:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:46:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 10:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:30:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:40:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:24:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:17:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/10/2020 09:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:59:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 11:03:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:43:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 10:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:51:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:55:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:21:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 10:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:21:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:46:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:23:00
COVID SARS-COV-2 IGG	UNABLE TO PERFORM	05/07/2020 10:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:59:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:02:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:43:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:31:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:59:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:46:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:53:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 09:35:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:28:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 10:50:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:01:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 09:24:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 10:38:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:31:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:22:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:02:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 18:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:44:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 10:02:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:38:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:48:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:10:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:37:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:34:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 09:17:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 11:05:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:50:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:12:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/10/2020 09:01:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 09:22:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:01:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:54:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:48:00
COVID SARS-COV-2 IGG	POSITIVE	05/07/2020 10:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:05:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:30:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:08:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:48:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:50:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 10:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:27:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 10:24:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:40:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:28:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 09:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:47:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 07:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:35:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:05:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:35:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:07:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:42:00
COVID SARS-COV-2 IGG	NEGATIVE	05/10/2020 09:32:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:44:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:01:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:37:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:44:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:40:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 17:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:10:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 09:38:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:38:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:06:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:54:00
COVID SARS-COV-2 IGG	POSITIVE	05/07/2020 10:10:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:55:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:51:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:33:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:31:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:37:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:05:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 10:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:38:00
COVID SARS-COV-2 IGG	NEGATIVE	05/10/2020 09:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 14:31:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 11:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:15:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 10:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:46:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:01:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 10:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:10:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 18:10:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:40:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:23:00
COVID SARS-COV-2 IGG	POSITIVE	05/10/2020 09:09:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:06:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:29:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:30:00

SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 16:34:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:58:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:15:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 10:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:13:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 09:47:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 16:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:16:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 09:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:09:00
COVID SARS-COV-2 IGG	POSITIVE	05/07/2020 10:46:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 08:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:38:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:01:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 08:32:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 07:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:01:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:50:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:44:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:30:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:17:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:30:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 10:03:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/10/2020 09:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:31:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 17:17:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:52:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:01:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:27:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 09:25:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:45:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 08:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:18:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 17:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:45:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:04:00
SARS COV 2 RNA, RT PCR	POSITIVE	04/22/2020 11:10:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 08:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:02:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:12:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:43:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:53:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:40:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:18:00

COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:53:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:35:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 09:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:16:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:02:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 10:14:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 09:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:17:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:31:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:59:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:05:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:50:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 17:00:00
COVID SARS-COV-2 IGG	POSITIVE	05/07/2020 08:02:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:16:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:47:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 08:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:10:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:32:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:05:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:17:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:53:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 10:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:01:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:55:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:13:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:48:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:30:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 10:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 16:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:30:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:13:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:23:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:05:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:37:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:48:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:45:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:50:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:14:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:02:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 09:32:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:42:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:32:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:58:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:08:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 08:57:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 16:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:43:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:31:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:02:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 11:04:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:53:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:56:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:02:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:05:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:09:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:29:00
COVID SARS-COV-2 IGG	POSITIVE	05/09/2020 10:46:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:47:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:07:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:53:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 11:43:00
COVID SARS-COV-2 IGG	NEGATIVE	05/08/2020 09:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 09:56:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:59:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 16:58:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:21:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:08:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:21:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/08/2020 08:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:30:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:58:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:42:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:41:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:21:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:05:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:37:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:43:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:39:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:46:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/09/2020 09:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 08:20:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/11/2020 14:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:17:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:40:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:59:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:44:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:31:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:59:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:05:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:30:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:30:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:17:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:08:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:22:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:44:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:58:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:34:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:12:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:09:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:31:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:25:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 09:27:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 07:54:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:19:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:26:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 08:18:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:29:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 11:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:03:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 08:30:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:33:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:35:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 08:28:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:37:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:35:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:19:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:53:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 08:08:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/10/2020 08:49:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 10:30:00

SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:11:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 09:02:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:44:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:23:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:36:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 17:27:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 10:58:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/08/2020 10:24:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 09:30:00
COVID SARS-COV-2 IGG	NEGATIVE	05/09/2020 09:18:00
COVID SARS-COV-2 IGG	NEGATIVE	05/07/2020 10:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:42:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/09/2020 17:15:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	04/27/2020 14:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	04/24/2020 13:45:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/07/2020 07:51:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	04/29/2020 22:49:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/07/2020 07:51:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	NEGATIVE	05/11/2020 13:00:00
SARS COV 2 RNA, RT PCR	POSITIVE	05/11/2020 13:00:00

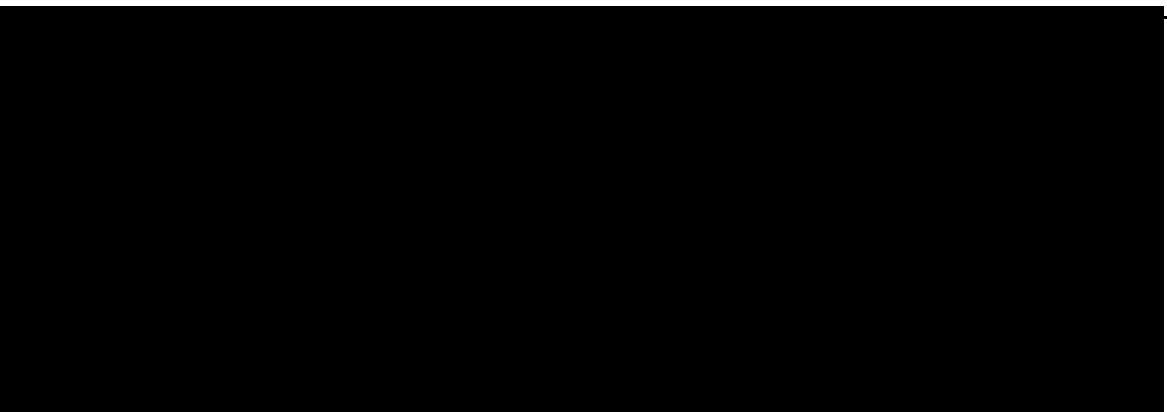
EXHIBIT D

COVID-19 Suspected/Positive Quarantine List

Total Positive 17
Total Negative TBD
Total Pending 2
Total Tested 816

NOTE: BLUE HIGHLIGHTED AREA REPRESENTS INMATES INCARCERATED GREATER THAN 6 MONTHS

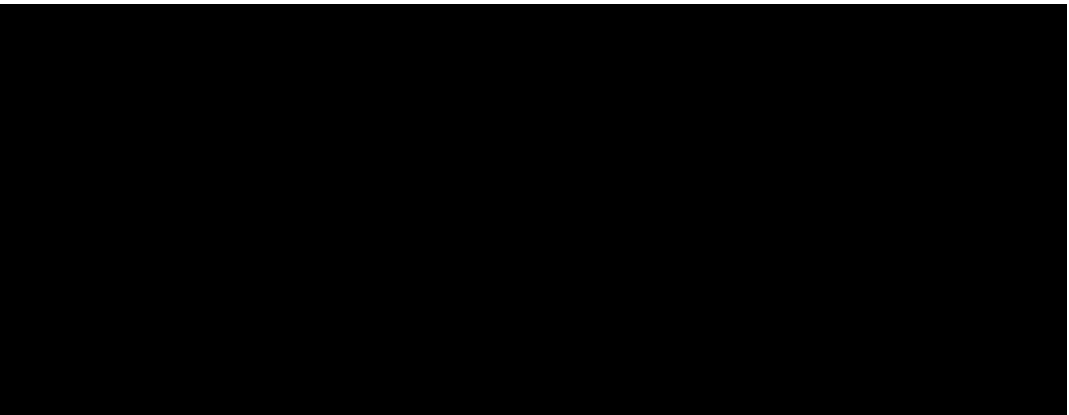
Inmate	Age	Home Unit	Booking Date	Transfer Date	Testing Date	Location	Virus Status	Symptom Level
	33	10NE	2/19/2020		4/7/2020	CMU	Positive	Mild
	47	D3?	3/6/2020	4/6/2020	4/7/2020	CMU	Negative	Moderate-Mild
	44	10SE	12/8/2018		4/6/2020	CMU	Positive	Mild
	26	D2&SHU	5/9/2019	4/3/2020	4/13/2020	Segregation	Negative	Moderate-Mild
	37	10NW	1/15/2020	4/12/2020	4/13/2020	Segregation	Negative	Mild
	27	414?	8/29/2019	4/13/2020	4/14/2020	H3	Negative	Mild
	33	D2?	3/24/2020	4/14/2020	4/14/2020	H3	Negative	Mild
	19	?	10/25/2019	4/9/2020	4/17/2020	H3	Negative	Mild
	53	D2A4	12/16/2019	4/20/2020	4/20/2020	Harper Hos	Negative	Moderate-Severe
	19	2-A4--14-01	2/21/2020		4/22/2020	Unit Quara	Positive	Mild
	25	2-A4--14-02	1/28/2020		4/22/2020	Unit Quara	Negative	Mild



41	2-A4--14-05	9/18/2019		4/22/2020	Unit Quara	Positive	Mild
27	2-A4-14-06	2/18/2020		4/22/2020	Unit Quara	Negative	Mild
30	2-A4-14-07	3/31/2020		4/22/2020	Unit Quara	Negative	Mild
24	2-A4-14-08	4/6/2020		4/22/2020	Unit Quara	Negative	Mild
30	2-A4-14-11	3/8/2020		4/22/2020	Unit Quara	Positive	Mild
26	2-A4-14-12	3/10/2020		4/22/2020	Unit Quara	Negative	Mild
19	2-A4-14-13	8/10/2019		4/22/2020	Unit Quara	Negative	Mild
21	2-A4-14-14	3/19/2020		4/22/2020	Unit Quara	Positive	Mild
25	2-A4--13-11	2/1/2019		4/22/2020	Unit Quara	Negative	Mild
28	2-A4--13-07	3/2/2020		4/22/2020	Unit Quara	Negative	Mild
58	2-A4--13-03	3/19/2020		4/22/2020	Unit Quara	Positive	Mild
46	2-A4--13-01	12/20/2019		4/22/2020	Unit Quara	Negative	Mild
29	1-5NW	4/24/2020	N/A	4/27/2020	In Unit Que	Positive	Mild
44	2-A4--14-03	12/3/2019		4/22/2020	Unit Quara	Negative	Mild
34		2/5/2020	5/4/2020	5/4/2020	H3	Negative	Mild
34	DIV 1	3/16/2020	N/A	5/7/2020		Positive	None
36	606	2/26/2020	4/12/2020	4/13/2020	Segregation	Negative	Mild
57	D3?	4/8/2020	4/8/2020	4/13/2020	CMU	Negative	Mild
25	605	12/21/2018	4/14/2020	4/13/2020	Segregation	Negative	Mild-
55	H-1	11/19/2019	4/8/2020	4/14/2020	Segregation	Negative	Mild
39	11SE	4/14/2020	4/15/2020		Segregation		Mild
59	D3?	4/3/2020	4/10/2020	4/17/2020	Segregation	Negative	Mild-

27	D2508	3/2/2020	4/21/2020	4/21/2020	Segregation	Negative	Mild-
37	1-10 SE	12/18/2019	4/21/2020	4/21/2020	Segregation	Negative	Moderate
35	1-10 SE	1/10/2020	4/21/2020	4/21/2020	Segregation	Negative	Mild
34	1-5-NW	4/16/2020	4/21/2020	4/21/2020	Segregation	Negative	Mild
33	2-14-14-03	4/14/2020	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
18	2-A4-14-09	3/3/2020	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
21	2-A4-14-10	3/2/2020	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
23	2-A4--13-10	5/19/2019	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
49	2-A4--13-09	8/23/2019	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
45	2-A4--13-02	4/3/2020	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
26	2-A4--13-04	1/23/2020	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
42	2-A4--13-08	1/2/2020	4/22/2020	4/22/2020	Unit Quara	Negative	Mild
29	?	4/20/2020	4/23/2020	4/23/2020	Segregation	Negative	Mild
28	2-03-07-08	3/12/2020	4/23/2020	4/24/2020	Unit Quara	Negative	Mild
63	SHU	1/28/2020	N/A	4/24/2020	SHU	Negative	Mild
46	SHU	9/9/2020	N/A	4/24/2020	SHU	Negative	Mild
64	SHU	11/9/2019	N/A	4/24/2020	SHU	Negative	Mild
26	SHU	1/31/2020	N/A	4/24/2020	SHU	Negative	Mild
48	SHU	10/16/2019	N/A	4/24/2020	SHU	Negative	Mild
52	SHU	3/4/2020	N/A	4/24/2020	SHU	Negative	Mild
28	SHU	4/15/2020	N/A	4/24/2020	SHU	Negative	Mild
53	SHU	4/11/2020	N/A	4/24/2020	SHU	Negative	Mild
43	SHU	7/3/2019	N/A	4/24/2020	SHU	Negative	Mild
29	1-10 SE	3/18/2020	N/A	4/24/2020	1-10 SE	Negative	Mild
28	1-10 SE	11/12/2019	N/A	4/24/2020	1-10 SE	Negative	Mild
34	1-10 SE	2/2/2020	N/A	4/24/2020	1-10 SE	Negative	Mild
29	1-10 SE	1/28/2019	N/A	4/24/2020	1-10 SE	Negative	Mild
36	1-10 SE	12/9/2019	N/A	4/24/2020	1-10 SE	Negative	Mild
55	1-4NE	4/13/2020	N/A	4/17/2020	In Unit Que	Negative	Mild
22	A-4-11	1/3/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
39	A-4-11	2/14/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
20	A-4-11	11/23/2019	N/A	4/26/2020	In Unit Que	Negative	Mild

27	A-4-11	11/21/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
31	A-4-11	1/31/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
29	A-4-11	9/26/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
44	A-4-12	2/28/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
56	A-4-12	5/11/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
33	A-4-12	3/26/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
49	A-4-12	2/10/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
29	A-4-12	3/31/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
51	A-4-12	4/12/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
30	A-4-12	7/31/2018	N/A	4/26/2020	In Unit Que	Negative	Mild
29	A-4-12	2/21/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
23	A-4-12	2/24/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
24	A-4-12	1/13/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
25	A-4-12	6/20/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
25	A-4-12	6/20/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
30	A-4-12	7/31/2018	N/A	4/26/2020	In Unit Que	Negative	Mild
29	A-4-12	2/21/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
23	A-4-12	2/24/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
24	A-4-12	1/13/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
25	A-4-12	6/20/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
50	A-4-12	6/27/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
21	A-4-11	12/19/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
26	A-4-11	6/7/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
26	A-4-11	10/21/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
54	A-4-12	3/12/2020	N/A	4/26/2020	In Unit Que	Negative	Mild
63	A-4-12	11/14/2019	N/A	4/26/2020	In Unit Que	Negative	Mild
30	Segregation	5/5/2020	5/6/2020	5/6/2020	Segregation	Negative	None
24	D2?	12/21/2018	4/6/2020	4/7/2020	CMU	Negative	Mild
35	DIV I	5/11/2019	N/A	5/7/2020		Negative	None
53	DIV II	2/12/2020	N/A	5/7/2020		Negative	None



38	DIV II	10/24/2019	N/A	5/7/2020	Negative	None	
39	DIV I	3/9/2020	N/A	5/7/2020	Negative	None	
54	DIV I	11/21/2019	N/A	5/7/2020	Negative	None	
20	DIV II	10/27/2019	N/A	5/7/2020	Negative	None	
38	DIV I	1/4/2020	N/A	5/7/2020	Negative	None	
28	DIV I	10/8/2019	N/A	5/7/2020	Negative	None	
66	DIV I	4/7/2020	N/A	5/7/2020	Negative	None	
68	DIV I	4/21/2020	N/A	5/7/2020	Negative	None	
50	DIV I	3/2/2020	N/A	5/7/2020	Negative	None	
39	DIV II	2/11/2020	N/A	5/7/2020	Negative	None	
19	DIV II	1/17/2020	N/A	5/7/2020	Negative	None	
32	DIV I	3/10/2020	N/A	5/7/2020	Negative	None	
58	DIV I	3/11/2020	N/A	5/7/2020	Negative	None	
52	DIV I	3/4/2020	N/A	5/7/2020	Negative	None	
23	DIV I	2/24/2020	N/A	5/7/2020	Negative	None	
26	D2?	3/29/2019	4/6/2020	4/6/2020	CMU	Negative	Mild-Moderate
60	1-10 SE	1/6/2020	4/21/2020	4/21/2020	Segregation	Negative	Mild
23	1ONE	3/3/2020	4/12/2020	4/13/2020	CMU	Negative	Mild
38	E-1	12/10/2019	4/16/2020	4/17/2020	H3	Negative	Mild
22	D2?	1/23/2019	4/22/2020	4/22/2020	Segregation	Negative	Mild
33	DIV I	2/4/2020	N/A	5/7/2020		Negative	None
31	1-10 SE	3/3/2020	N/A	4/24/2020	1-10 SE	Pending	Mild
30	Div 3	5/6/2020	N/A	5/14/2020	Segregation	Negative	Mild
30	Div 1	5/20/2020	N/A	5/22/2020	SSE	Negative	Mild
51	Div 1	5/21/2020	5/21/2020	5/26/2020	H3	Pending	Mild

Comments

Released on 4/14/2020
Released on 4/24/2020. #2 Re-tested 4/21/20
Negative

Released on 4/17/2020

#2 Re-test 5.9.2020--Negative

Negative as of 4/23/2020

Neg. as of 5/22/2020

Neg. as of 5/22/2020

Neg. as of 5/22/2020

Inmate presented in medical clinic with resp. distress. Inmate subsequently sent to the hospital. Test was conducted at Harper hospital for positive Covid, Influenza A and B results. #2) RE-test on 5/21/2020. Results Negative

Contact/Tethered out 5/6/2020

Contact/Neg. as of 5/22/20

Contact. Re-tested on 5/15. Remains Positive.
Contact/ Neg. as of 5/22/20
Contact/ Neg. as of 5/22/20
Contact/ Neg. as of 5/22/20

Contact. Retested on 5/4. Remains positive.
Released on 5/4
Contact/ Neg. as of 5/22/20
Contact/ Neg. as of 5/22/20
Contact/ Tethered out 5.4.20
Contact/ Neg. as of 5/22/20
Contact/ #2 Retest 5.28.20. MDOC

Contact. Retested 5/15. Remains Positive.
Contact. Retested on 5/10. Remains positive.
#3 Re-Test 5.22.20 Neg.

Tethered on 4/27/2020 before results
Contact. Retest 5.15. Results Neg.
Neg. as of 5/22/20
MDOC. #2 Retest 5.28.20 Results Pending

Released on 4/17/2020 prior to testing

Released on 4/27/2020

- Contact
- Contact
- Contact
- Contact
- Contact
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- Contact
- Contact

Released on 4/24/2020

- Contact
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Released on 4/24/2020

- Contact
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Contact/ Test Completed however inmate
would not allow the employee to properly
conduct the test: Using his hands to stop the
access of the membrane
Contact
Contact
Contact
Contact
Contact
Contact
Contact

Lives with 2 positive parents
**Remains Positive at day 14. Neg. as of
5.12.2020**
MDOC
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Remains Positive at day 14. Neg. as of 5.12

Negative as of 5.12

2nd Test Insufficient Sample. Retest to be sent

on 4/27/2020. Neg. as of 5.12

Negative as of 5.12

Negative as of 5.12

MDOC/ Inconclusive as of 5/8/2020. New test to be conducted on evening shift of 5/8/2020

Released on 4/24/2020

Pt stated at court (+) transfer to Div. 3. Patient re-tested on 5/14/20 results negative

Re-test Res

Patient stated --came in contact with COVID-19 (+) patient at work. Tethered 5/22/2020

Patient stated tested positive at the hospital. Re-test completed on 5/26/2020

**Wayne County Sheriff's Office
JAIL DIVISIONS – Population Report
CLASSIFICATION UNIT**

From: Deputy J. Howard
Date: Tuesday, June 2, 2020

<u>FACILITY POPULATION</u>	<u>JAIL I - MALES</u>	<u>JAIL I – FEMALE</u>	<u>JAIL II</u>	<u>TOTALS</u>
Effective Capacity	(467)	(252)	(606)	(1300)
Daily Population Totals	262	57	375	694
Booked	12	06/01/20 – 06/02/20	(0530-0530)	
Released	07	06/01/20 – 06/02/20	(0530-0530)	

Males

X-mode Div.1	02		
Available Gen. Pop. Beds -	41	(27 at Div.I & 14 at Div. II)	
Capacity/Assigned bed(s) - Discipline (Div.2)	14/02		
Capacity/Assigned bed(s) - Maximum Security (Div.1 & 2)	18/05		
Capacity/Assigned bed(s) - Protective Custody (Div.2)	21/17		
Capacity/Assigned bed(s) – Infirmary (Div. 1)	17/06		
Capacity/Assigned bed(s) – Capias (Div. 1)	02/00		
Capacity/Assigned bed(s) - Mental Health Floor (Div.1)	120/50		
Capacity/Assigned bed(s) - Youthful Offenders (Div.1)	64/08		
Capacity/Assigned beds(s) - Alternative Lifestyle (Div.2)	23/07		

Special Housing = Div. 2/ Pre & Post Discipline, Alt. Lifestyle, Prot. Custody and Max. Security
Div. 1/ Capias, Infirmary, Mental Health and Youthful Offenders

- **MDOC: Ride outs-00** **Area Hospitals** **Bed Outs: 57**
 Parole Violation Only – 03/01 (DIV 1/DIV3) Hospitals - 2
 Violation of Probation -00

Pre-Classification Housing Assigned - 34 (Capacity) 11th Floor

Kitchen Workers Target / Scheduled
 Kit 1D - 28/03
 Kit 1A - 28/03

Female

Capacity/Assigned bed(s) General Population	210/36
Capacity/Assigned bed(s) Pre-class Housing	28/09
Capacity/Assigned bed(s) Mental Health	28/12
Capacity/Assigned bed(s) Youthful Offenders	12/00
Maximum/Discipline	00/00
X-mode	00

CLOSED

7 th Flr	9 th Floor	7 Annex	2-Annex	8 th Floor
Available beds - 128	Available beds-128	Available Beds-53	Available Beds-86	Available Beds-64
1Old	12 th Floor	3-Annex	13/14	11 th Floor
Available beds - 43	Available beds-128	Available Beds-86	Available Bed – 143	Available Beds- 96

VIDEO ARRAIGNMENT/BOND REDUCTION INTERVIEWS

Bond Reduction Interviews	-00	06/02/2020 (based on previous date)
Video Arraignments	-02	06/02/2020(based on previous date)
Professional visits	- 21	06/02/2020 (based on previous date)
Pre-Exams/PC/MH	-22	06/02/2020(based on previous date)

Federal – 00 Jails I&II, Capacity 168 – 200

Female- 00 / Male- 01

FACILITY POPULATION

<u>FACILITY POPULATION</u>	<u>JAIL III</u>	<u>Kitchen Workers Target / Schedule</u>
Effective Capacity	576 MALES + 00 FEMALES = 576	KIT 3D 40/00
Male – Capacity/Available beds	135/236	KIT 3A 40/00
Female – Capacity/Available beds	00/00	
Totals-	135/239	
Beds out - 09	14	
Closed Housing	A-1, B-1, D-1, F-3, C-3, D-3, C-1	

POPULATION DETAILS (Jail III)

Electronic Monitoring	1082 (00 work release)	Pre Trial	27
GPS/Residential Treatment	02	Diverted Felons	08
USM	00	Post Convictions/Pre Sentence	06
Out-State Jail	00		

DECLARATION OF ANTHONY LAWS

1. My name is Anthony Laws. I am 65 years old and will be turning 66 next month. I am currently incarcerated at Division II of the Wayne County Jail System, 10SW. I have been here since the 4th of May. My next court date is June 26.
2. I have high blood pressure and suffer from COPD and I have arthritis in both knees, in my right ankle, and in my left hip. I have an inhaler at home for when I get short of breath because of the COPD, but I didn't have it with me when I was detained. There's supposed to be an inhaler here but I asked for it and the doctors never let me use it. They said that my medical records didn't have my COPD listed. And I have a prostate problem that makes it difficult to urinate, but they won't give me anything for that either. I also told them that I have problems with the left ventricle of my heart, and that I had a slight heart attack some years ago. The only thing the nurses ever give me is Tylenol, which is no help with the pain.
3. My blood pressure keeps going up. Every time the nurses come here to check it, it's high as heck. The nurses come here twice a day but sometimes when they come down you won't get served. They don't be on schedule or nothing. Just now, a nurse took my blood pressure by placing a band around my arm. She didn't have gloves and she had to touch me to check my blood pressure.
4. Because of my high blood pressure, the nurse said they might restrict me from buying things from the store. But I'm pretty sure that the thing making my blood pressure go up is the food that they give us. For dinner they give us bologna meat that's salty as heck, and the sodium is bad for me. And the cereal that they give us for breakfast is so old that it's not crunchy anymore. It's thin and flexes like rubber. It's soggy even when it's dry if that makes sense. I don't know how old it is, so I don't eat it because it could make me sick. Now they're trying to take the store away from me, but I have to eat.
5. I don't know how to get real medical help while in here. When I ask the guards for help they throw a blue form at me and then I fill it out and don't hear nothing for two to three weeks. I had to fill out a kite for my knee and for all my pain. It took about two to three weeks to go down there. If something serious happened, I'd die in here waiting. For a while I had a lot of soreness in my neck and when I swallowed I felt pain. I filled out another kite and never heard back. That was two weeks ago.
6. To go see the doctor you walk down to the elevator and go down three or four floors. Sometimes in the elevator there's four or five people at a time, and there ain't no distance. Like a can of sardines, same as in the holding cell when you're waiting for court. There weren't many people in there when we went to medical, maybe two of us there. The doctors were wearing gloves and masks. I've seen some nurses in there without gloves.

7. I did get tested for the corona about a month ago, but I still haven't gotten my results back yet. After the swab and after they took my blood they just sent us right back here. But we don't even know our results yet so who knows who's positive here?
8. I'm sharing a cell, and it's not supposed to be like that. It's supposed to be a one-man cell but now someone's in the top bunk maybe 4 feet above me. Because of corona, its supposed to be a one-man cell. That's what it says according to their own policy, which is on the tablets in the law library. There's only supposed to be 10 of us in this pod but it's about 20. It's hard to distance at all in here. I can't stay in my room all day because of my arthritis; otherwise, my knee and hip get very stiff.
9. I heard of inmates coming down from quarantine to where I'm at, and there's one in my cell. He said he spent the time he needed to in quarantine and came down here. I don't know if he was tested.
10. There are windows in the cells but they're long strips that barely let any light in. They don't open.
11. In the common area, there isn't any distance. None of that. It's pathetic. There's five tables bolted into the ground and each of them have four seats welded into the table, kind of like a picnic table. If there's four people sitting at a table, they're right next to each other, arm's length to your side and in front of you. The tables aren't clean when it's time to eat. No one comes in to clean them. They're supposed to according to the policy on the tablet in the law library, but no one does. Some people are sitting at them right now and they shouldn't be because they're not clean. Same with the cells, there might be windows in the common area but you could walk from one end to the other and have barely any light.
12. Inmates pass out food without gloves.
13. Corrections isn't telling us nothing too much. They tell us we're not supposed to do any cleaning except in our own cells.
14. We don't have spray bottles even though we're supposed to according to the policy listed on the tablets in the law library. To clean our cells they give us rags that have a sour smell.
15. We have the blue PPE masks. In the common area some inmates wear the PPE and some don't. We don't have gloves. The guards wear their own masks, some brown and some black. They don't always wear them. Some do and some don't.
16. I'm fearful for my life using these phones because people talk into them all day and they aren't cleaned. There's nothing to clean them with.
17. We don't have hand sanitizer. And I can't wash my hands the way I want to because of the way the sink in our cell works. There's a little button that you push for hot or cold water and it doesn't come out sufficient enough for me to be able to get enough water to do it right. I want to be able

to clean my hands for more than a few seconds but I can't. I'm not sure if the water's clean because it's connected to the toilet, and when you flush the toilet roaches come out from around the rim. Some people call them water bugs but they sure as hell look like roaches to me. That's the same water we're drinking.

18. They give us these little bitty thin cakes of soap. You can get two or three if you tell the guards you're out, but I don't think that soap's all that good for cleaning because I was using it when I first got here and wasn't getting clean. I've been buying my own soap as long as I've had money on my account. The soap costs \$1.65 per bar.
19. It's kind of risky to shower; you have to catch it when it's just been cleaned. They don't clean it constantly. There's three or four of us that get up in the morning and clean them with watered-down bleach, and then after we clean we shower and get the hell out of there. When the curtain is hanging over the side the water runs down the curtain and gets outside. There's gray filth on the curtain and sometimes on the shower walls.
20. I try to clean the toilet but there's germs and bacteria on a seat like that, and I share a cell with another man. So it's easy to run out of the toilet paper. We can get toilet paper but some guards tell us they'll give it to us later when we have to use the bathroom now. We don't have paper towels.
21. My clothes and sheets haven't been cleaned in two to three weeks. When they do laundry, the guards walk around with a clear plastic bag where we put our clothes and sheets. We keep our socks and personal underwear and wash them with our own soap. And if we have white t-shirts that we came with sometimes we can throw those in the laundry bag and then dry them on the vent in our cells. The store has underwear and socks on the store list but they're often out of stock. Right now I see a price on them for 5 dollars a pair of underwear, 2 dollars for a pair of socks, and 10 dollars for a pair of thermals.
22. I was up all night last night, like I am most nights. I'm very fearful because there is no protection here. No cleaning up and no way to clean up. It's a raw deal to be hanging on here with the corona. No one should be here.

This declaration was orally sworn to Anthony Laws on June 10, 2020 because Wayne County Jail is not currently permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I, Faiz Pirani, have read the foregoing in its entirety to Anthony Laws on June 10, 2020.

DECLARATION OF ARIEL SUNDAY

1. My name is Ariel Sunday. I am 34 years old. I am currently incarcerated at Wayne County Jail in Division 1, Unit 10 Northeast. I have been here since February 5, 2020. Six of my court hearings have been cancelled. My next one is scheduled for July 14, 2020. I am not confident that the July 14th court date will be anything meaningful because all of the other inmates are going to court on the tablet and their hearings are just being adjourned or postponed.
2. I feel forgotten. I feel dismissed. I suffer from COPD, severe asthma, and an autoimmune disease that weakens my immune system. Having these medical conditions, I feel like the jail should have protected me a little bit more than they did. But, they didn't and so I got the virus.
3. When I first came to Wayne County Jail, I did not have COVID-19. Since I got here, they have shifted me around to places where I believe I got exposed. After spending my first two days in Division 1 in an open, dorm style setting, they moved me to E1 in Division 3. In D3 is where I learned about COVID-19 from the news. At that time, there was no PPE. No masks. The deputies were coming in and out, not wearing masks, nor gloves. Some were infected and I believe they spread the virus to us all.
4. People in here started dying. There was a guy housed in my unit who worked in the laundry room. One day, we just didn't see him again and heard that he died from COVID-19.
5. There was another guy 6 doors down from me who wore a pacemaker. We saw him collapse. He was taken up to the hospital and never came back. I asked what happened to him and they said that he died. Because I was a pod-worker, I had to clean out his cell. They didn't give me a mask, gloves or bleach. All of the pod workers -- there were 7 of us -- we were the first ones in the unit to get sick because we were cleaning up after everybody else.
6. Eventually, I did end up getting COVID-19.
7. I think I got exposed from using the inhaler. We all use the same inhaler. The nurses give each of us a hole shaped spacer that is made of cardboard that is about one inch long to place where the inhaler extinguishes the medicine. Being an airborne disease, that preventative measure was ineffective. The guy who passed out and died -- I know he had asthma. Maybe he got it from the inhaler.
8. I started feeling symptoms: dragging my body, couldn't breathe, throwing up on myself. I even pooped on myself one time. I was sweating, having these hot flashes. I had the look. My eyes had glazed over to dark gray. We all knew what that look was.
9. When I first got sick, I filled out a KITE. Then I asked the deputy if I could go up to healthcare but he said that they don't want anybody to go up to healthcare. So I had to

wait till the second shift of nurses came around. I told them about my problems. I told them I felt like I was going to die.

10. When I went up to healthcare, they said that I didn't have a temperature so I didn't have COVID-19. I told them about all of my symptoms and that I felt like I was going to die. They told me to go back to my unit and drink more water.
11. When the nurse came to my unit later that night, she prescribed me Tylenol for two weeks.
12. Then, I was transferred to Division 1 around April 14th; one week after that, I started to feel the symptoms again. I felt weaker than before, aches in my joints and my breathing was labored. I told the nurses but they just gave me some Tylenol. At this point, I still hadn't been tested for COVID-19.
13. Coincidentally, I ended up being called down to healthcare for another reason: to get my three month checkup for my autoimmune disease. During that visit, they checked my temperature. It was at 107. From there, they transferred me back to Dickerson where I was placed in a segregation pod for about 4 days until the results of my test came back.
14. They put me in H3, the COVID-19 pod; I stayed on that pod for 3 weeks. In H3, I was locked in my cell 23 hours a day. In that 1 hour, I had to use the shower, phone, watch TV and clean my cell. When I was locked in the cell, I would have chest pains and it was giving me a lot of anxiety; the only recourse I had to alert the guards that I couldn't breathe was to get up and beat on the door. But since I couldn't breathe, then how would I get to the door? I panicked at all times. I felt like they just wanted me to die. I thought, if I really can't breathe and I can't get up to bang on this door, then I am just going to die.
15. When I tested negative, they shifted me back to D1. 10 cells. 20 guys. 2 men in each cell where we are 3 feet apart from each other. I am breathing in his air at night and he's breathing in mine. In the hall, we have 4 or 5 tables with seats that are 1 foot apart; we have to eat at these tables. The only way I can socially distance is if I am alone in my cell, without my bunkmate.
16. We only get 1 toilet paper roll per week. We get 2 bars of soap that are the hotel complimentary size bars. I have to wash my hand, my body and my t-shirt, socks and underwear with those two bars.
17. If someone else flushes the toilet in another cell, excrement comes up in my toilet. Also, there are no toilet covers so if excrement comes up into my toilet while I am sleeping, it may be there all night. We then have to simultaneously flush the toilet for the excrement to go down.
18. The staff frequently come in without their masks on. This has been going on for a while. Back in march, none of them were wearing a mask. I was so scared so I wanted to wrap a

towel around my face but they wouldn't allow that. I have a mask now but the problem is, we only receive one disposable mask every two weeks. My mask is dirty right now.

19. Trustees who prepared our food tested positive for COVID-19. I was scared about that -- how am I supposed to get clean when the trustees who were fixing the food have the virus?
20. They are heavily rationing the food during the pandemic. We get 1 cold sandwich at night. 1 hot meal for lunch. 1 small breakfast. These are not the regular meals we would get.
21. I am still feeling these chest pains and it seems like different things are happening to my body. I don't know what the lasting effects of this are but I still feel pain and weakness in my body and in my joints. On top of that, they have not allowed me or any other guys to get Tylenol when we request it. They told us that now we have to buy it from the store and I am indigent so I can't purchase any.
22. I am still having anxiety. I still think I am going to die.

This declaration was orally sworn to me by Ariel Sunday on June 11, 2020 because the Wayne County Jail is currently not permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I have read the foregoing in its entirety to Ariel Sunday on June 11, 2020.

By:

Saba Rewald

Date: June 10, 2020

DECLARATION OF DARRIUS COCHRAN

1. My name is Darius Cochran. I am 51 years old. I've been detained at the William Dickerson Detention Facility since March 6. I'm now on Unit E-3.
2. I went to medical the second I got here. There was a guy coughing in there real bad. He didn't cover his mouth. Two days later, I couldn't get out of bed and I was sweating. I had this really bad cough. My chest was hurting. My neck was hurting. I know what the flu is like, but I had never been sick like this before. My whole body was hurting. I was throwing up and I had diarrhea real bad and pains all over my body.
3. When I tried to get up, my legs wouldn't work. Some guys helped me up. The deputy called and ordered me a wheelchair. I went to medical. I was sweating. They say I didn't have a fever but I was sweating real bad and had a real bad cough. I sat down there for hours. They didn't pay me no attention. Everybody was going in front of me. I'm just sitting there, like I was faking or something. That really pissed me off. They wasn't taking me serious.
4. They finally got to me and took my temperature. They gave me water and juice and sent me back to the pod. My head was hurting. I had no appetite. I went back to medical. They gave me three bags of an IV. I sat down there for a while. Then I went back to the pod and went to sleep.
5. I slept for like seven days straight. I didn't get up to eat, just to use the bathroom. I tried to walk. Every few steps I took, I was out of breath. I had to use the wheelchair for eight or nine days. The deputies referred to me as the guy in the wheelchair. I was worried to death.
6. The whole time I was sick, I was in C-1, an open pod. My bed was probably five or six feet away from other people's beds. I still had to get food from the cafeteria, but I couldn't because I was too sick. No one brought it to me. I just didn't eat for seven days or so. At medical, they ordered me food but I didn't eat it because I was too sick.
7. After I was sick, I cleaned my bunk with Simple Green, but that was all I could do.
8. A few of the guards gave us information about COVID. But they was always joking about it. I didn't find it funny. I didn't really know why I was sick and laying out in the bed. I didn't find out until I was better and watching the news.
9. I bought deodorant and soap because the soap and deodorant they're giving me is garbage. We clean our rooms with Simple Green. It's a degreaser. It's not killing germs or anything. We never have bleach or Lysol or anything like that. The first few days, they had us spraying our stuff down with Lysol, but that ended real quick. One of the deputies

brought that on his own, for the pod. It was his personal Lysol. Ever since then, we've just been using Simple Green.

10. I was on C-1 first. They moved us to E-3, then something was wrong with E-3, so the guys from E-3 moved back down to E-1. We was down there a couple weeks. It was jam-packed. It was like 60 of us in the open pod. There wasn't no social distancing. It was dangerous.
11. I have high blood pressure. It took them over a month to prescribe my high blood pressure medicine. I just started getting it May 6. The nurses knew about my high blood pressure. My pressure was up every time I went to see the medical center. When I was sick, one time it was so high they thought I was going to have a stroke. When I don't get my medication, I have headaches and see spots in my vision. The third time when I asked the nurse for my high blood pressure medication, she said she couldn't get in touch with the pharmacy. Now, they're giving me a different kind of medication for high blood pressure. I've never even seen the kind they're giving me now. It took a while for my body to get used to it. I was sleeping a lot when they first gave it to me. I couldn't stay awake.
12. I still got a pain in my neck and in my side that won't go away, ever since I was sick. I see guys writing kites and they never get answered, so I just sit back and I just pray on it.
13. They tested us on May 9, but they didn't give us our results. One guy asked about his test results, and the guard just told him to beat it. We got a blood test and a swab up the nose test. I guess one of them is the antibody test. They came and got two guys off the pod, and I guess they still had it or whatever. They moved them to quarantine. The rest of us still don't know anything. We were playing cards every day, sitting around eating with them, shooting basketballs with them. If they had it, we got it.
14. I'm scared. I want to go home, but I don't want to give COVID to my family. The scary part is they keep saying my court date is January 1, 2021. I asked what my lawyer's name is, and they say I don't have a lawyer. I asked for a lawyer last Friday, but there's still no lawyer in the computer for me.

This declaration was orally sworn to by Darrius Cochran on June 9, 2020.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Darrius Cochran on June 9, 2020.

By:

Maiya Moncino

Date: June 9, 2020

DECLARATION OF JIMMIE CARD

1. My name is Jimmie Card. I am 48 years old. I am currently incarcerated in Division II of the Wayne County Jail. I have been inside since February 4, 2020. I have not been sentenced and I have been to court twice.
2. I have hypertension, high cholesterol, and respiratory problems. But I cannot go to medical to attend to my personal health issues. No one responded to my medical kites because the doctors passed away due to coronavirus. When I try to talk to the guards to see the nurse for my blood pressure, they are not concerned.
3. The guards tell us that what is going on outside of the jail is more important. We are second. It's like we are not even here. Like we don't even matter. They haven't really given us any information about COVID-19.
4. The jail tested me for COVID-19 on May 6. I have no idea whether I have COVID-19 or not because they never told me the test result. We don't know who is positive or negative because they won't tell us the outcome.
5. I see other people coughing all the time. In here, if one person gets sick, all others get sick, too.
6. Guards have been getting sick. The nurses told me that the 2 doctors who passed away, 26 guards, and 30 something inmates all tested positive for COVID-19. There is no quarantine. The people who tested positive are still around and they came out to hang with other people. We just stay in the same space. There are no cleaning or improvements to our conditions even after these people have tested positive.
7. We ask the nurse that comes around about COVID-19, but she is not telling us anything. We keep asking her about the situation, but she is not taking us seriously. She just tells us that this is an emergency and we don't matter. The nurse is fully geared up with a mask and gloves. The only medicine she will give me is Tylenol for my back pain. I am supposed to have it every day, but they ran out. I get no medicine for my other conditions.
8. The jail is in unlivable condition. We are two and a half feet apart in the common area and we are together all day, every day. There is no way to social-distance. The space is too small even if we tried. We use the same phone, three tablets, and the same TV in the common space.
9. The 10 of us share the same shower. The trustees used to come once a week to clean the shower with bleach. But now, due to COVID-19, they let the trustees out and there is pretty much no cleaning of the shower. They won't give us any bleach when we ask.

10. We change sheets once or twice a week. We have to wash our laundry by hand when we get into the shower. We don't get anything to help clean our sheets and laundry.
11. We are always asking the guards for cleaning supplies. But we don't get enough of them. We get no hand sanitizers and no cleaning supplies for common spaces. They only give us one mop and some cleaning solution to clean the floor. We all share the same mop and cleaning solution.
12. We only get one role of tissue paper and three small bars of soap per week. We are living off of soap and water that we buy from the commissary to clean. We pay \$1.5 for a very small bar of soap. The price for soap is so high that some people can't afford it.
13. There is nothing positive coming from the guards. But the guards tell us that they take off their entire uniform before going into their homes and keep telling us that we should feel safe here. How can we feel safe when they won't even go into their houses with their uniforms?
14. We get terrible food. We have some cereal, corn bread, juice, and some peanut butter for breakfast. We get only one hot meal with some hot dogs, vegetables, and fruit for lunch. We only get cold food for dinner. The guards serve the food. We complained about them not wearing masks when serving the food. Some do now and some still don't.
15. The jail is also giving no instructions. They only give us disposable masks twice a month. They don't help us clean it. They just tell us to keep the masks on and wash our hands. They haven't had any statement about the situation. They haven't given us any handouts about how to handle everything. I talked to the sergeants, but they say that they don't even know what's going on.

This declaration was orally sworn to Jimmie Card on June 9, 2020 because Wayne County Jail is not currently permitting documents to be exchanged for signature.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Jimmie Card on June 9, 2020.

/s/ Emma Xu

By: Emma Xu

Date: June 9, 2020

DECLARATION OF JOE COLEMAN-SMITH

1. My name is Joe Coleman-Smith. I am 21 years old. Before coming to Wayne County Jail, I was working two jobs: landscaping and roofing. I am currently incarcerated at Wayne County Jail in Division 1, Section 306. I have been here since August 4, 2019 and my next court date is scheduled for June 29th, 2020.
2. I have asthma but I don't have access to an inhaler. I asked the nurses about getting an inhaler and they said they would look into it but I still don't have one.
3. Two weeks ago, I had bad chest pains and heavy breathing. I submitted a KITE but it took a nurse 2-3 weeks to get back to me. She gave me Motrin or Tylenol. She didn't check my temperature but I think she checked my blood pressure because she put something on my finger.
4. The way I found out about the coronavirus was by watching T.V. The news told us about the virus, not the guards. There are 10 guys in our unit and we stand shoulder-to-shoulder, bundled up, to watch T.V. Some guys seem scared because some of their family members have passed away from the virus.
5. We get one mask every month. They do our laundry every 3 to 4 weeks. We are given one roll of toilet paper a week which lasts about five days because of how thin the tissue is. We are given 2 bars of soap a week. Two bars is like one shower for me so I ask people to borrow their soap and pay them back when I get the other two bars. I also have to use that soap to wash my underclothes, t-shirts and socks. I also use the soap to clean my bars by lathering it on one half of my towel.
6. We have never gotten disinfectant spray to clean. For the mop, we just use the water from the shower but I have never seen it come with any cleaning solution. Today when I woke up, it was just the mop, bucket, broom and dustpan. No spray and no cleaning solution. I believe all the trustees have gone home. The last time I saw a trustee was probably a month or two months ago.
7. There's black mold in the shower. Whenever someone wants to shower, they have to ask the guards to turn on the water from the outside, behind the wall. Sometimes they do and sometimes they don't. My sink works off and on. I can't get any hot water and the cold water trickles.
8. My toilet has overflowed 3 or 4 times. When it floods, poop comes up and it gets onto the floor. It gets into the tiles on the ground. The last time it happened was two days ago. I asked the guard for a plunger and it took him half an hour to get back to me. I had to use the broom and the dustpan to sweep up the water and the poop and I poured it back into the toilet. I used the mop to soak up the water. They didn't give me any cleaning solution or gloves and, on that day, I didn't have any soap to clean with. We get soap every Tuesday so I will had to wait until then to re-disinfect my room.

9. Some guards walk around with their masks off. A few deputies who had the coronavirus came back to work and still walk around with their masks off. We don't know if we can get it from them. I feel like we can catch it, get sick, and probably die from it.
10. They said if we didn't get our nose swabbed or blood drawn, they were going to lock us down for 30 days. The whole pod would be punished if one person didn't want to get tested.
11. Lately, I have been feeling really emotional. I really don't know what is going on and what is going to happen to me.

This declaration was orally sworn to me by Joe Coleman-Smith on June 10, 2020 because the Wayne County Jail is currently not permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I have read the foregoing in its entirety to Joe Coleman-Smith on June 10, 2020.

By:

Saba Rewald

Date: June 10, 2020

DECLARATION OF KELWIN EDWARDS

1. My name is Kelwin Edwards. I am 51 years old and a father to seven children. I am currently incarcerated at Wayne County Jail in Division 2, Section 614. I live on a hallway with 14 cells. I have been here since March 18, 2020 on a writ.
2. I was scheduled to have re-sentencing on March 27th but they have moved my court date to January 1st 2021. This is inhumane. I have 7 children to go back to but I don't know if I am going to make it because of my health issues and the quality of medical care here. I am frustrated everyday that goes by. Everybody is scared. People want to go home, especially people who have not been sentenced. We are just being held without any further dates and the courts are not moving like they are supposed to.
3. When I first got here, I was put in quarantine in Division 2, 1402 with three other guys. They call it 'the new side.' It was so nasty. It was filthy. You could see old milk and old juice on the old steel, rusted table. I had to use my only towel to clean it. The deputies don't have anybody come in and clean anything in the quarantine unit. It was up to us to clean, but we weren't given any cleaning supplies. The showers were so filthy. I was scared to take a shower. While I was in there, I got a rash on both elbows which I was never treated for.
4. I believe I got the rash from putting my elbows on the table. My rash consists of bumps that are rough and spread across my elbows. It's very itchy and irritating to the point that rubbing doesn't do it and scratching suffices. I wrote a KITE and didn't get a response. I have received no ointments or medical attention.
5. I suffer from seizures because I got shot in the back of the head. I have an enlarged heart. My knees are bad and, to take care of them, I need exercise. I can't exercise in here. We are cooped up like chickens.
6. I have a stomach issue called Seroma. My stomach has swollen up very badly because I just had surgery before I came here. I am supposed to have a follow-up operation to remove the fluids in my stomach.
7. I went to see the doctor in the medical ward which is located 50 feet down the hall about my stomach. When I got there, they chained me in the cell and I was told to sit in a blue chair. An officer was standing behind me. He stayed there for the entire consultation.
8. The doctor came in. His name is Dr. Korinstein. He had an attitude and complained about all the things he had to do. He said that there wasn't anything wrong with me. I was confused by his statement because he hadn't even touched me nor inspected me. He insisted that nothing was wrong with me. He didn't give me any medicine or relief. He told me he won't send me to hospital. He made it very clear that they don't want to send anybody to the hospital. This doctor doesn't care about anybody. He lied to the staff here and said he observed me and didn't see anything wrong with me. I had no choice but to go back to my unit. When I returned, I was wearing the same clothes and mask. I heard

that Dr. Korinstein has been fired along with the previous medical providers called CCS. Now, our healthcare company is called Wellpath.

9. It seems like they are waiting for something drastic to happen to you. Being here is mind-boggling and shell-shocking. I am fearing for my life.
10. I have written a lot of KITES but the nurses don't always have KITE forms. When you ask for a KITE, the nurse will tell you that she is not a KITE nurse meaning that she is not responsible for the forms. I have not seen a KITE nurse in here for weeks. The funny thing is, you don't know who is a KITE nurse and who isn't because they turn their name tags backwards. You don't know who is who. The only way you know if someone is a KITE nurse is if they announce it but I have not heard anyone do that in the last three/four weeks. They might not come back.
11. Sometimes the other nurses are willing to distribute and collect KITES but that only happens if you are lucky. Then, you may or may not get a response. When I was able to see the doctor about my stomach, it was 4-5 days after I submitted the KITE. Usually it takes 2-3 weeks. I was told that the doctor only comes on Thursdays.
12. They have me on a no-soy diet. I don't know why. They won't take me off until I see a doctor. I have submitted a KITE to do that but the doctor won't see me.
13. Three weeks ago, I couldn't taste or smell anything. I had a really bad headache. I felt like my eyes were going to pop out. I was feeling woozy. My throat was hurting. I was feeling like I had flu symptoms. I saw the coronavirus symptoms on the news and the guy next to me actually tested positive for the virus so I knew that something was wrong. I hope it wasn't the coronavirus. I didn't come here to die.
14. I told a nurse about my symptoms. She told me and the other guys experiencing similar symptoms that she would get back to us. Two to three days later, she said we would get tested. One week later we got tested. We never got back our results.
15. We talk to the nurses, seeking information about the virus. They say they will get back to us and they never do.
16. We are afraid that we will get sick and go through a medical process that is terrible. Actually, we had three guys in here that were really sick and were coughing a lot. The jail staff told the nurses. It took the nurse 4 or 5 days to come check on them. The nurses checked their temperature and identified that they had fevers. They just left them in the unit with the rest of us.
17. We have to bang on our doors to get cleaning supplies. We have been asking for bleach. Every time, they say no.
18. We only have access to whatever they give us in the morning which is a mop and a bucket. I don't know what is in the bucket. There is sometimes a cleaning solution in it

that is green. There is no rag. There are no gloves. You have to use your one roll of toilet paper to wipe down your table, bars, etc.

19. When the supplies come through, you have to wait your turn. By the time I get to the spray bottle, the solution is all gone. They fill the bottle once a day. You can't buy other cleaning supplies from the commissary. All they have is laundry detergent.
20. I can't clean the phone when I use it because there is nothing to clean it with. They either take the spray bottle or it is empty. There is nothing sitting beside the phone for people to clean it with. Meanwhile, sitting at the guards' desk are paper towels, Lysol wipes, gloves, masks and shields, only for them to use.
21. My toilet overflowed a couple of weeks ago. Somebody on the next floor behind me flushed. Fecal matter started coming up through my toilet, all the way to the rim. It started bubbling and splashing on the floor. I ran out and yelled for bleach. The guards said that they would get back to me but nobody ever came. I didn't use the bathroom that day. I slept in the cell that night. I had no choice. I had to wait an entire day to clean it up. The next day, it happened to the guy next to me. The lady gave us bleach and a scrub brush. I had to demand bleach. We were not given gloves.
22. In the showers, there's a lot of lead paint that falls from the ceiling on the floor. Laundry is terrible. We have to wash our own underwear in the shower.
23. I am not safe here.

This declaration was orally sworn to me by Kelwin Edwards on June 1, 2020 because the Wayne County Jail is currently not permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I have read the foregoing in its entirety to Kelwin Edwards on June 1, 2020.

By:
Saba Rewald
Date: June 1, 2020

DECLARATION OF MARCUS LYNN

1. My name is Marcus Lynn. I am 50 years old. I am currently incarcerated at Wayne County Jail in Division 2, Section 614. I have been in jail since June 26, 2019.
2. My next court date is scheduled for June 16, 2020. I hope that I am able to go to court but based on the experiences of the other inmates, it seems like it will be cancelled.
3. We are in a state of limbo. The other inmates and I feel confused. Nobody knows what is going on. Nobody knows anything. We are scared. We often wonder, are we going to die in here?
4. I have not seen a KITE nurse since I came to this unit. I have diabetes and severe pain in my neck and shoulders but since I have been in section 614, I have not been seen for any of my health concerns because there is nobody that comes to collect our KITE forms. I have heard other inmates coughing and there was no response from the jail staff. They didn't even take that person's temperature. There was actually a man in our unit who ended up testing positive for the virus who was walking around and talking to everybody. Once he tested positive, we all asked to get re-tested but they refused. I truly believe that a person would have to be unconscious for the jail staff to send them to receive medical help -- to get to see a doctor you would have to be dead. Otherwise, you are stuck in this unit.
5. Section 614 is one long hallway with 14 cells. There are no windows that open or that you can see through. As a matter of fact, I haven't seen the outside since last summer.
6. We have one T.V where all 14 of us stand huddled around to watch the news and other programs. If we didn't watch TV, we wouldn't know anything about coronavirus. We have to stand close to each other to watch the TV because if it's too loud, the guards will cut it off.
7. The guards don't really interact with us. They don't stay around us too much -- like we might give the virus to them. Someone could be asking a question and the guards will just ignore them and keep walking. We are scared just like they are.
8. We share one broom and one mop with some solution in it. They give us a spray bottle every once in a while with a cleaning solution in it. Sometimes it's Simple Green and sometimes it's all clear and we don't know what that is. It's not a real solution of Simple Green because it's too light. Real Simple Green is dark green and this is a watered down, light green. In their rulebook, it says that we need cleaning supplies twice a day to mop the hallways.
9. When the coronavirus happened, they said they would spray the bars and cells regularly but I can't remember the last time they sprayed the bars down. When I get a spray bottle, I spray my bars down. I haven't seen anybody clean the phones, tablets or remote controls.

10. The iron roof in the shower is rusty and it has paint falling down from it. There is a circulation vent but it's so rusty and corroded. The roof is mildewed. The bars are rusty and mildewed.
11. The toilet and sink are in your cell. Most of our sinks have something wrong with them so we have to get water from the shower or someone else's cell. We have been asking them to put in work orders for a lot of our sinks but they have not been fixed.
12. The toilet in my cell has overflowed. Each toilet is hooked up to 4 other toilets -- one toilet in your unit and 2 of them in the units behind them (plumbing is H layout). So, if someone's toilet overflows in the unit behind yours, then it will overflow in your cell. Also, if there's is stopped up, the fecal matter will come up through to your toilet. When my toilet overflowed, they gave me a mop but no cleaning solution so we used the shampoo that we had. The first time it overflowed, me and 3 other guys were moved to the quarantine unit for a couple of days. When we came back, we still had to clean up the mess. In either instance, we weren't given gloves.
13. We get three little bars of soap per week. The commander came down and presented us with a study that the average American uses 3oz of soap but what he doesn't realize is that other people have soap dishes. We have to hold our soap in our hands when we shower and it just evaporates. We also have to use that soap to wash our underclothes. They don't wash our underwear and t-shirts. We have to use the soap to wash our underclothes or else we have to buy detergent from the commissary.
14. We are given one roll of toilet paper a week which we have to use to clean surfaces as well as when we use the bathroom. When you run out, the guards won't give you a new roll. Usually, the inmates share what they have with each other.
15. We get a new mask every two weeks. By the time they change them out, the masks are ragged.
16. We don't know our fate. We don't know if we are going to die in here.

This declaration was orally sworn to me by Marcus Lynn on June 1, 2020 because the Wayne County Jail is currently not permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I have read the foregoing in its entirety to Marcus Lynn on June 1, 2020.

By:
Saba Rewald
Date: June 1, 2020

DECLARATION OF RYAN GHIST

1. My name is Ryan Ghist. I am 33 years old. My grandfather and sister live in the Detroit area. I used to live here, but I've been living in Arlington, Texas for the last 12 years. My grandma died last month.
2. I am really close with my aunt, and I try to talk to her when I can, but I don't have money for more than the occasional 3-minute call, and most of that is spent talking about my case because she's the only one who's in touch with my lawyer.
3. I started out in Division I, and then was moved to Division III, and now I'm in Division II. I tested positive for coronavirus three times and then negative the last time I was tested. I think I got it in Division I because I didn't have any pain until April 12th which was three weeks after I got there, and then I started getting all of the symptoms. I had a cough, a fever, chills, soreness, diarrhea, and I lost my sense of taste and smell. The first time I was tested was seven days after they put me in quarantine. That came out positive. The next time I was tested was three weeks after my first time I was tested. Then my third and fourth ones were a week after each other. Only my fourth test came out negative.
4. A lot of deputies in Division I were sick and a commander died. A lot of them were positive. I was the newest guy in Division I when I got there, and I think I caught it from a deputy. They were the only ones who I was in contact with because they would come to our cells to maintain order and to give us meals through a slot that they could only access by opening the main door. I was really afraid to catch covid because I was really scared. I never left my cell—didn't go to rec or anything—because I was scared. I was wearing my mask the entire time before I got sick, even when I was sleeping. It was the blue one that they gave us, and now I don't even think those masks do anything to protect us. Some guards are not wearing masks and a lot of them will keep moving it off their face. I'm not sure if they brought their own masks from home or if the jail gave them those masks, but I think we should all have them because this place is so disgusting. The masks that we get are changed every two to three weeks. I haven't seen anyone wear gloves except for the nurse and deputies.
5. I knew I had it once I started getting the symptoms, and I begged a guard to take me to the nurse but he told me to fill out a kite. I was in so much pain though that I could barely move. Another inmate went to go see the nurse two days later and told her about me, and that's when she finally came to my cell to see me. She took my temperature and I had a fever. She moved me to the quarantine pod in Division III right then and there. That was around April 15th. After six days I got my first test. A week later they told me that I had

tested positive. They checked my temperature twice a day at first and then less often. It got as high as 103.5 degrees. My chills were also really bad.

6. In quarantine, it was a single-man cell. We were under 23 hours lockdown and 1 hour free time. I wasn't able to shower every day because the showers were broken. There were eight showers and only one was actually working and it didn't even have hot water. I never saw anyone but me cleaning the shower. I took it upon myself to physically spray Simple Green on the showers and the microwave and TV remote and chairs and phones myself. I took the shower once and after I realized it was cold, I just washed myself up in the cell. I told a deputy that someone needed to come in and fix it but no one ever came. I also know that on that floor, a lot of the toilets flooded but no plumbers ever came to fix it.
7. There were assigned pod workers chosen by the deputies who were also in quarantine whose job was to pass along requests from the inmates and the deputies. The pod workers had tested positive too, which is why they were all in there. They called me out of my cell to serve food three times a day, and the person who served food before me never wore gloves.
8. I stayed in quarantine for somewhere from 36-45 days. When I was sick, they gave me cough syrup, Tylenol, and Gatorade. It didn't really help with any of my symptoms.
9. As soon as I tested positive, I felt like the guards treated me like a rabid dog with fleas. They put me in the room with the other positives and told us to clean up after ourselves. The guards would pass out the same spray bottle for us to use it in each of our cells. When we first got into quarantine, no one had gloves. Eventually, the deputies got them, but we never had gloves and we were the ones actually using the spray bottle.
10. I was moved to Division II the day after I tested negative. They took two or three weeks to change our linens.
11. In Divisions I and II, they don't respond to simple requests and act like we're trying to cause trouble when really we're just scared for our lives. I have to beg for cleaning supplies, even bleach which we're supposed to have but rarely do. When we don't have bleach we have to use water to clean the cell floor which doesn't help. This is crazy. I don't feel safe anymore, especially since I've already had it. What's stopping me from catching it again?
12. Asking a guard about what the conditions are like outside and getting an actual answer is like finding a needle in a haystack. If I ask them a question, even if I ask really nice,

they're really short with me. And if they do give an answer, they're either uninformed or just don't care.

13. I don't think that the cleaning spray they give us to clean our cells is bleach even though they're supposed to give us bleach. I don't know if it does anything. The shower is nasty. It floods every day, and there's mildew and funny odors no matter how hard you try cleaning.
14. They're not feeding us properly. It's the same meal every day and it's not enough to fill me up. No one who hands out the food has gloves. We're supposed to have one cold meal and two hot meals, but instead we get two cold meals and one hot meal. They're supposed to serve us two hot meals according to the rules on the tablet, and they did when I first got here, but sometime in April they switched our dinner to bologna sandwiches. The hot meal is for lunch, and for dinner we get bologna sandwiches. I barely eat any of it because the meat comes out slimy. I think it's pre-prepared, so who knows how long it's been sitting out. The lettuce they serve us is dirty and has been sitting out for a while. For breakfast, we get a scoop of peanut butter and stale corn flakes. They sometimes give us expired juices and expired milks. On many occasions I've gotten expired milk, and they still serve it to us.
15. There are at least 20 men in a pod and there are constantly new ones coming in from off the street, and who knows what they're bringing in? No one cleans the cells when people are transferred or released. They just put new people in the same cell.
16. Each cell has a toilet attached to a sink. The toilets don't work right. Sometimes we'll have to go to the cell next to us and flush the toilets at the same time just to make the shit go down. And other times we have to keep trying to flush and that overflows it. Roaches come through the toilet and through the air vents. There are always water bugs too. This is the same water we drink. I'm scared to drink that water.
17. The mops and brooms are disgusting. It's our responsibility to clean our cells, and so we should have the proper supplies to do that. The mop and broom are shared between four pods: 10SW, 10SE, and two others on this floor, including the trustee pod. We have to wait until the mop and broom are done being used, and no one bothers cleaning the mop properly.
18. There is no hand sanitizer.
19. They gave us this small bar of soap that fits in the palm of your hand. I literally beg for cleaning supplies because commissary only comes twice a week and they're always

running out of hygiene products. They tell us they're out of stock and that we can reserve it for next week, but what do we do in the meantime? I've already had to buy 2 bars of soap with my own money but they run out so often.

20. Social distancing in here is a joke. It's impossible. Literally impossible. Everybody's right next to each other in the common areas, shoulder-to-shoulder, eating at tables that are bolted to the ground in chairs that are bolted to the table like a park bench or picnic table. The common area is a little smaller than a classroom and is really narrow. People come to the common area to watch TV, use the phones, and play cards. Everyone's usually out in the common area. It's pretty crowded in here. There's supposed to be six tablets in here, but two don't work at all, and only one of them rings when calls come in. That's for the eighteen guys who are here right now. There are two phones to a cell. They put two people in a room, which is not much bigger than a closet, so there's no social distancing.
21. They give us toilet paper when it's in stock but as of late, we just get these flimsy paper towels, the type that they used to have in elementary school. If we use that to clean we get our hands dirty because it's so thin and we don't have gloves.
22. I have a window in my cell that doesn't open. I can look outside, but the only ventilation is recycled A/C air. The A/C is always blowing but I don't know where it's blowing from. It could be the air from the quarantine unit for all I know.
23. The most dangerous things in here have got to be the phones. Everyone is talking and breathing into them and no one cleans them because we don't have wipes. Most of us have started covering the speaker phone with a sheet of paper towel because we don't want to get sick or get other people sick, but it still feels dangerous.
24. I feel like I'm sitting here rotting away. No one belongs here. It's a death sentence.

This declaration was orally sworn to me by Ryan Ghist on June 11, 2020 because the Wayne County Jail is currently not permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I, Faiz Pirani, have read the foregoing in its entirety to Ryan Ghist on June 11, 2020.

DECLARATION OF SAMUEL JOHNSON

1. My name is Samuel Johnson, I am 34 years old, and I have been in the Wayne County Jail, Division II, Block 306 since January. I am still awaiting my trial as my conference has been postponed six times because of COVID-19.
2. I was tested for COVID-19 almost a month ago. They gave us two tests, one blood test and one swab test. The guards told us that if we refused the tests, they would lock us down for 30 days. Even though it has almost been a month since the tests, no one has found out about their results yet. Everyone in here is frustrated and angry because we are not with our families and we can't protect ourselves from the disease. I'm especially scared because of my bronchitis. I'm always nervous about contracting COVID/
3. I have bronchitis, which sometimes makes it hard for me to breathe. The guards give us masks about every two weeks, but they are the kind you see in hospitals that are disposable after one use. They are cheap and get destroyed easily.
4. It's difficult to keep my cell clean in here. The guards bring a cleaning bucket in the mornings but it only has a broom and a mop in it. The mop is never washed so it stinks. We all just sweep our cells instead. And they only bring cleaning solution every so often. The solution is Simply Green and it seems very watered down. If we ask for it when it's not in the bucket, the guards just tell us there isn't any for us that day.
5. Our cells have a bed, a sink, and a toilet in them. The sink is only cold water. The toilets in the cells have been known to get backed up and overflow and I sometimes have running water under mine.
6. I don't see them clean the common areas or the things we touch often, like the phones. If we want things cleaned, we have to do it ourselves. But they don't really even give us supplies to do that. And the bars that separate our cells and the blocks are really nasty and dirty. I've only seen the bars clean once since I got here, but other than that they have always been filled with dust and generally gross. Sometimes the guards spray the Simply Green stuff on the bars but they never wipe them down so they never actually get cleaned.
7. Once a week I am given three tiny bars of soap to use when I shower but they are cheap and dissolve quickly. I don't have access to tissues or paper towels, and I only get one roll of toilet paper per week. There isn't any hot water in our cells and the ten of us in the unit all share one shower. But we can only shower after asking the guards to turn on the water since the showers broke a while back. And some guards don't know how to turn on

the shower so we have to wait for one who does know how to do it to be on duty before we're able to shower. Without the guard turning on the water, we don't have access to hot or cold water in the shower. And the showers are typically cleaned once a week but sometimes that is skipped so the shower goes weeks without being cleaned at all. To clean the shower, all the officer does is use Simply Green but that doesn't really do anything. There is black mold in the shower right now.

8. It is impossible to social distance in here. There are only a few tables in our unit so every time we eat, we all sit right next to each other. Everyone wears their mask because we want to protect ourselves from COVID-19 but also because the guards force us to. The guards have turned off our phone for someone in the unit not wearing a mask and they have threatened to lock us down for not wearing it. But the guards aren't always wearing masks. I remember a few guards saying that they had already had COVID-19 and gotten over it so they had immunity and didn't need to wear their masks. We yelled at them to put their masks on. But when the guards serve us food, only some of them wear both masks and gloves. The guards often treat us like we are a different species than them.
9. Towels are washed sometimes once a week but sometimes we have to wait up to three weeks before our towel is washed. And when we get new dry towels, sometimes they are still dirty. In the past when I've gotten a dirty towel, usually the guard who gave it to me refuses to give me another one. Then I have to wait until another day when a nicer guard is on duty to get a clean one. They don't give us washcloths, we have to buy those at the commissary.
10. Kites are ignored. As for kites, I've submitted a few about my ankle, my knee, and my tooth, which are all in pain, but they just give me a few weeks of Motrin and then stop. I haven't gotten any medical attention since COVID-19 started and it seems like they stopped all medical services except for passing out medications. In fact, the lady who used to pick up kites doesn't come around anymore. I'm submitting another kite today about my teeth because the tooth I wrote about before was broken and causing me pain so I just broke it all the way but I have three other broken teeth too that need to be looked at.
11. The air in here is recycled and nasty. There is a vent that is blowing air but it is never fresh air, only recycled. We never go outside to exercise and there are no windows that open in here. There is no ventilation and we are all just breathing the same air.
12. The food in here is like baby food and we only get one hot meal a day. Breakfast is usually just a handful of cereal and a piece of cake that is nasty. We usually have a hot lunch that is something like a chicken patty with one piece of bread, mashed potatoes, broccoli and apple sauce. And then dinner is usually a small sandwich (two pieces of

bread with a couple slices of meat and lettuce) and a pack of cookies. I am always still hungry after every meal. The guards also sometimes smash our breakfast cakes on purpose so we can't eat them and its just a pile of crumbs.

13. The food comes from Division III since the kitchen in Division II is closed. Inmates make the food but I don't think they wear protective gear since just this morning, my breakfast tray had hair on it that came from the guy who made it.

This declaration was orally sworn to Samuel Johnson on June 8, 2020 because Wayne County Jail is not currently permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I, Clara Butler, have read the foregoing in its entirety to Samuel Johnson on June 8, 2020.

DECLARATION OF SHAWN CROTHERS

1. My name is Shawn Crothers. I am 53 years old. I have been incarcerated since February 7. I'm currently at the William Dickerson Detention Facility in Unit E-3.
2. When COVID first hit, the guards were disappearing because they were getting sick. At first, the guards had masks and we didn't, but they weren't wearing their masks all the time, and they were getting us sick. Some of them keep their masks around their chin instead of their face. Now, we have to have our mask up or we go to the hole.
3. I believe I had COVID around the second week of March. My body just hurt so bad and I didn't get out of bed to eat or nothing for like three days. They wouldn't do anything for us. They just told us to drink plenty of fluids. I told the nurse that I didn't feel right. She asked if I had a fever, but she wouldn't take my temperature and just told me to put in a kite. The nurses would get mad or look at you funny. They all had an attitude like we shouldn't be saying anything about it. It was uncomfortable. They acted like it was our fault. That was before we even had masks or anything. We didn't know what was going on. They were hiding everything, it seemed like to me. They weren't giving us any information. We only get certain channels because the cable wires are all messed up and we've got potato chip bags tied together as a makeshift antenna for the TVs. It's hit or miss if we can watch the news or not.
4. The guards never really explained anything about COVID. They just said we should clean our rooms and clean up around the common area. They never gave us any bleach or anything to clean with. They gave us Simple Green, a green solution, but they put it in their own bottle. It didn't have a label on it from the store. They just put their own sticker on it and told us it was our cleaner. It was obvious that the stuff in the bottles was not the original stuff that was in the bottles. They put something else in there.
5. They did give us masks and told us to keep them up. They're five-hour masks, but we only get new masks every two weeks. They're not keeping us from getting it, because they're garbage. That's basically it. I have a hard time breathing.
6. I clean up the trash, which is definitely a hotspot for COVID. One officer, Anderson, won't even let me take the trash out unless it's overflowing because he wants to save on garbage bags. The garbage bags are much bigger than the trash cans, so the stuff is going all over the floor.
7. The deputies moved us around quite a bit once COVID started going crazy, so I've been in a few different units. They moved me six times to different pods. They never gave us

any explanation. When they first started moving us, they said they were cleaning, but they moved us to a new pod and then two hours later they moved us back into the old pod. When we got back, it wasn't clean. Nothing was done. The garbage was still in the garbage. Things were still on the floor. They were not explaining anything.

8. Then they would move us randomly. They would tell us to pack up and move and not tell us why. I think it was because somebody was coming in to check this place, and they were hiding us so it looks like they're doing social distancing. But they weren't doing any kind of social distancing at all. They kept the bunks full until early April. They were still double bunking some people in my pod until the first week of April.
9. They used to charge \$4 to put money on commissary, and they changed it to \$10. Obviously, there's not as many people in here and they're losing money. They're charging more to make up for it.
10. They tested us for COVID on May 9, but they won't tell anybody the results. The students from Wayne State who tested us told us we would have the results within 24 to 48 hours. They took our blood and stuck a swab up our noses. We didn't sign anything, which I thought was weird. As far as I know, when somebody takes your blood, they have to give you a result. They didn't tell us what they were doing with our blood.
11. When they took our blood and nose swabs, they said if we don't take the test, they would put us in segregation. No one refused, because you don't want to be locked in a cell by yourself all day, every day.
12. Every time we ask about the test results, we get brushed off. Nobody seems to know anything, but that's garbage. They know.
13. The people who they said had the active virus, they took out of here. They only took two people out of each pod and took them down to the Coronavirus pod, H-3. The guard told me that. I'm thinking there's no way that's right because the two guys they took out of here, we play cards with them every day. We play basketball with them, we work with them. They say that nobody else who played basketball with them, worked with them, ate with them had it. I think they couldn't separate us all, because there were too many of us that had it. I think that's why they weren't giving us the test results, because then we would all know. It's like they were just acting like they were taking care of us by taking two guys out of each pod.
14. I went to the psych and he told me I had PTSD from the stress. I'm seeing everyone sick and not knowing if I'm going to get out of here. You're in here and, especially with the

court thing and not knowing what's happening, it's hard. It's stressful. It's wearing on me. They put me on medication about it.

15. I'm worried about my family, and they cut off our visitation and said they would give us free phone calls to call our families. But then they cut the phone calls off, and now they don't give us that or visits. If you don't have any money to call your family, you're screwed. I've got family out there and a girl and stuff. They don't have to treat us this way. No bond, no court date, no nothing. It's just hard when nobody gives a crap. I'm having a hard time dealing with it. I was depressed, sitting in my room a lot. Especially when I got sick and didn't know what was going on, and they weren't doing nothing. It's hard. It's hard to deal with all of this stuff.

This declaration was orally sworn to by Shawn Crothers on June 9, 2020.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Shawn Crothers on June 9, 2020.

By:

Maiya Moncino

Date: June 9, 2020

DECLARATION OF TERRISE JOHNSON

1. My name is Terrise Johnson. I am 69 years old. I am currently incarcerated at Wayne County Jail in Division 3, pod H-1. I have been here since April 20th, 2020. My court hearings on March 26th, May 15th and June 5th were cancelled. Now, I don't have a future court date; when I check the machine, it is blank.
2. The day I arrived at Wayne County Jail, I suffered a heart attack. On April 24th, I went into surgery and they put two stints in my heart. On April 25th, my birthday, I had to go back into surgery to get three more stints put in. I have an irregular heartbeat, hypertension and high blood pressure.
3. I am supposed to take 9 different medications per day. Sometimes they only give me 6 of those pills and, on other days, I might not get any. The nurses come down here and say first call and last call and, if I can't get to them in time, they will leave without ever giving me my pills. The problem is, I am too breathless to get to them in time so I just have to lay in bed, suffering. Only one nurse, Ms. Morrow, is willing to check my blood pressure.
4. My nose is running and I get really cold. I sweat in bed. My body is aching and I am in pain. When I tell them, they tell me nothing is wrong with me. They are supposed to give me pain medication because the doctor said that I would feel pain around my chest and arms but they don't even do that.
5. The nurses throw away the KITE forms. If something serious were to happen to me, I would have to tell the deputy. Then, he would call up to healthcare and, over the phone, healthcare decides whether I should come up or not. It's not easy to get seen up there. The nurses usually want to come down to your pod to see you but they might not even do that.
6. They have me on a restricted diet but I don't even know what I am supposed to eat and what I am restricted from. They give me broccoli with no buds on it, just the stem. They give me bologna every day. The tray of food is ice cold when we get it. And a pack of ramen noodles is 89 cents in the commissary when it's 33 cents out in the streets.
7. They wanted to test me for the virus when I got back from the hospital after my surgery. I got tested at the hospital but Sergeant Lynch said that he was going to lock me up in the hole if I refused. I have never received any of my results. The results from the hospital are locked up upstairs and they refuse to provide me with a copy.
8. The guards have not told us anything about the virus. They just tell us to stay away from them, to stay away from their desk. Go down there. Go out there. Don't come up here. Some of them don't even wear their mask. They are really nasty and ugly towards us. They play god over the gloves and over the napkins. In the mornings, they hide the microwave.

9. There are 17 guys on this pod. If you want to watch T.V, you have to sit right next to another person. There are 5 spots on the couch in the back and 4 or 5 spots on the couch in the front. We are also required to eat meals at the tables in the center of the pod. There are four guys per table and 8 tables.
10. There is only one opening where you can look outside, smell the grass and get some fresh air. People gang up around there, sitting close together to get some fresh air. Everybody tries to get a spot by the opening to breathe some fresh air and get some sun.
11. To clean, we get a mop, water and some watered down spray. We also get a dirty rag that has been used a million times. When you clean with it, it is as if you are dragging germs around.
12. My toilet overflowed twice. The deputy brought me a plunger but I couldn't use it because I didn't have the strength or energy to push. I used the mop to soak up the water on the floor but I wasn't given any cleaning solution.
13. I am out of breath every day. I am tired. My head hurts. If I die in here, I just want them to know what happened to me.

This declaration was orally sworn to me by Terrise Johnson on June 10, 2020 because the Wayne County Jail is currently not permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I have read the foregoing in its entirety to Terrise Johnson on June 10, 2020.

By:

Saba Rewald

Date: June 10, 2020

DECLARATION OF ANTHONY BLACK

1. My name is Anthony Black. I am 37 years old. I am currently incarcerated at the William Dickerson Detention Facility of the Wayne County Jail System. I have been here for 9 months now, and my release date is August 7, 2020.
2. I suffer from Type 2 Diabetes. Ever since my mother died in January 2020 of complications due to her Type 2 Diabetes, I have been very concerned about my own health. I have felt very alone since my mother passed, and I was not even allowed to attend her funeral.
3. I take metformin twice a day. I used to take insulin but now I don't take it all the time. I don't trust it, especially after my mom died. And I don't know what the nurses are giving me. I don't trust them.
4. My lifeline is my older sister. We talk as much as she can afford to, usually twice a week. But the calls are expensive, and I know she has difficulty paying for them. I miss my son, who is three years old. I have full custody of him. I also have a newborn daughter who I have not met yet.
5. Conditions in this jail are scary and it is obvious that we are not prepared. I am assigned to clean some common areas and feel especially exposed to areas that are dirty and not maintained. But the guards and workers rarely clean surfaces, so it's up to the people who are incarcerated to look after themselves. I think that the worst part of the jail other than the toilets is the gym, since people there rarely wear masks and there are so many shared surfaces.
6. I am very worried about my Diabetes. Every day, I feel sharp pain starting in my toes and fingers then shooting through my body. Sometimes my toes and fingers get numb. I also have a runny nose, and there are not enough supplies here. It takes too long to get medical attention. There's a form that the guards pass around to fill out kites. Everyone who wants to go to medical puts their name down. But it takes a long time anyways. I get to see a nurse twice a week because of my Diabetes, but the visits are short and they haven't fixed my soreness or numbness. What if I have a bad reaction to insulin or if it stops working or if I don't get it when I need it? I am worried, especially after my mom died.
7. In the whole jail, the only place where people actually socially distance and wear PPE is in the medical unit. They gave me Tylenol when I told them I had a runny nose. I was tested for COVID-19 and it came back negative. But before we got our results, we all went back to normal so I don't trust it.

8. I help serve meals. I serve breakfast every day at 5 in the morning with 3 other guys. We're the pod workers. Lunch is at noon and dinner's at 4. We finally got gloves in this week but we didn't have them before that.

9. The guards have not been helpful at all. They tell us to socially distance, but this is impossible, and even the guards can't help but brush up against the detainees when they pass us in small spaces. Everyone says they are scared, but not many of us are wearing our masks.

10. Most of us cannot socially distance in our cells. I'm lucky because I'm in a single, but most of the people here are in doubles, where you're right on top of each other, and anyways it doesn't matter because everywhere other than the cell, you're right next to each other.

11. Supplies are limited. I have never seen hand sanitizer here, and I was only given one roll of toilet paper. I had to buy another roll from another detainee. One roll does not last very long at all. In the last week, they finally started giving us toilet paper every other day. There is a liquid that they told us is disinfectant, but it's so watered down that I don't know if it does anything. They tell us to clean our cells frequently, but no one has enough to clean everything properly, especially the toilets and shared surfaces. We each got one thin blue mask to use, and we did not get new ones for two to three weeks. There are not enough gloves for us. They run out often.

12. The toilets are disgusting. Showers are okay after the trustees clean them once a week, but that does not last for long, and no one else wants to clean that shit. Some of them are clean sometimes but some aren't ever. Gnats come from the toilet. The toilet upstairs overflows when it flushes, and no one ever comes to clean it or fix it.

13. Jail staff rarely wear masks or gloves.

14. The air conditioning turns on and off often.

15. I heard that there are at least four detainees quarantined on the third floor. They tested positive for COVID-19. We call that floor "corona rock." Three of the people up there came from here, in Dickerson. I don't know about the fourth one. I also heard that people from another facility were moved there even though I don't think they ever tested positive. I went up to the third floor to go get my metformin, and I was in the same booth talking to a nurse as someone who I know was positive. He was wearing a mask but we were still really close to each other.

16. People who tested positive or are coughing get their temperature checked twice a day. I know that someone had a fever, and I have not seen him since, so maybe he is up there now on the third floor.

17. I was upset that it took so long for us to get tested. It should have happened before May. But not everyone wanted to get tested. I heard a guard tell people that anyone who refused a test would be sent to “corona rock.”

16. I really am trying our best to socially distance, but it’s impossible. I’m scared for my life. So is pretty much everyone else here. I can’t wait to get out.

This declaration was orally sworn to Anthony Black on June 8, 2020 because Wayne County Jail is not currently permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I, Faiz Pirani, have read the foregoing in its entirety to Anthony Black on June 8, 2020.

DECLARATION OF CHRISTOPHER LONG

1. My name is Christopher Long and I have been in the Wayne County Jail Division II, Block 306 since July of 2019. I am 36 years old and I suffer from bronchial asthma, acute hypertension, high blood pressure, and high cholesterol. I have an inhaler for my asthma and I take medications for my blood pressure and cholesterol.
2. I was tested for COVID-19 three or four weeks ago but I was never given my results. I don't think anyone got their results from the testing. We have not been given any protective gear other than three masks over the last few months. We do not have access to gloves or hand sanitizer.
3. The mop bucket comes Monday, Wednesday, and Friday morning. But it's usually just a broom, a mop, and a dustpan. Sometimes there is a spray bottle with that Simply Green stuff in it but it has clearly been watered down. I know it's supposed to be dark green but by the time it gets to us, it is light green. It looks like it's mainly water. We don't have any tissues or paper towels in our cells or common areas.
4. The common areas are cleaned once about once a week by us, but only if we get the cleaning solution. All ten of us on the unit share one shower. It is normally cleaned once a week but I can't remember the last time it was actually cleaned. They used to have trustees clean the showers but since they have been released, now it is up to the guards. We shower every other day if we are lucky. But the water has been broken in here so sometimes we go days without showers if the officer on duty doesn't know how to turn the water on from behind the control panel.
5. The guards have different cleaning supplies from us that they use to clean their stations. They have Lysol spray, sanitizing wipes, and spray bottles filled with cleaning solution.
6. We are given three bars of soap that are tiny for the entire week. The bars of soap are about two inches long and one inch wide and they are supposed to last the whole week but you can only really wash your hands a few times before the whole bar is gone.
7. It is really hard to social distance in here. There are ten of us in one block and there is no way for us to practice social distancing in the common areas. We share one remote for the TV, one phone, and we all have to sit next to each other when we eat because there aren't enough tables. The common area is maybe 20 or 30 feet long and 4 feet wide. When we watch TV, most of us stand but oftentimes people crowd around the small TV so that they can see. I try to keep my distance since I'm a big guy. But I can usually only get about one or two feet away from the person sitting or standing next to me.

8. In our cells, we have a bed, a sink, and a toilet. There have been problems with the toilets overflowing, like the guy across from me whose toilet is plugged up every other day. Our cells are closed with bars but the cells are so close together that you could reach through the bars and touch someone in the cell next to you. The guard station is also only a few feet away from the cells.
9. There has been no movement to the medical ward and ever since COVID-19 hit, it seems like they aren't taking anyone anymore. I've put in three kites in the last month or so and when I tried to ask why they weren't being responded to, the nurse said that they weren't taking any patients because of COVID-19. The kites have been about trying to get a new inhaler. Normal kite pickup is once a week but sometimes you can get a nurse doing her rounds to submit your kite. But only some nurses actually submit the kites to the doctor.
10. I know that some of the guards have been sick with COVID-19 because I've seen some of them leave and then come back while others have not returned. They also talk about it all the time and even told us that some of them had been sick. But when it comes to us getting sick, it is hard to get any information about COVID-19 from the guards because they keep everything so hushed up and try to keep that information a secret from us. They don't tell us which inmates are sick or information about the disease in general. We get all our information about the disease from the news.
11. Everyone is fearful and scared in here and it is frustrating. All the inmates seem scared to even just interact with each other. And the guards don't seem to be taking the masks seriously, even though many of them have had COVID-19. When the guards don't wear their masks, we ask them why but they just say to stop hollering. One guard threatened to turn off our TV and our phone when we asked him where his mask was. But then whenever one inmate forgets his mask, the guards threaten to lock that person down.
12. Some of the blocks on the fourth floor are quarantined because a few people tested positive for COVID-19. They moved people around even before they had tested everyone, though, so some people who may have been positive were moved to different parts of the facility. The guy right across from me on the third floor now was moved from the fourth floor before he was tested. This makes us nervous that people are carrying COVID-19 and spreading it around when they move.

This declaration was orally sworn to Christopher Long on June 8, 2020 because Wayne County Jail is not currently permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I, Clara Butler, have read the foregoing in its entirety to Christopher Long on June 8, 2020.

DECLARATION OF DANIEL BRYANT

1. My name is Daniel Bryant. I am 41 years old. I have been detained at the William Dickerson Detention Facility since March 6. I was in C-1 until about April 20. Since then, I've been in E-1, E-3, and F-3. Now I'm in E-3. My next court date is June 22.
2. I have asthma. I also have injuries from a car accident in 2017. My whole left side is messed up: my back, my neck, my ankle, and my left shoulder. I've got a limp from that. Sometimes it'll act up, sometimes it won't.
3. My asthma and my injuries are bad because when I first got here and all this was going on, two of the doctors had passed away from COVID-19. The deputies kept denying me medical treatment because there were no doctors.
4. I never experienced my asthma this bad. Up in here, it's real dirty. We try to clean up as best as we can, but my asthma is real bad. When they opened up this gate, the pollen and everything comes in here. There's a pollen tree that sits right up in front. And that reacts with my allergies. E-3 is a closed pod. They're giving us recycled air. Sometimes that triggers my asthma. It's kind of hard to breathe sometimes. I don't have an inhaler. I never had to take it before. I was taking it when I was a child, but not since I was a teenager. I'm scared. I'm real scared. I try to keep my mask on 24/7.
5. Two months ago, I heard that the jail has a doctor again. I filled out a kite to see one but they still haven't taken me to see one. It's been two months.
6. I'm allergic to citric acid. It took them about a month just to give me my dietary tray. I had a breakout. I just catch hives when I eat too much tomatoes or citric acid. It's terrible. I'm itching and scratching. I break out all over my arms, the back of my neck, my chest. I'm itching and I can't take a shower because it spreads. They was giving me orange juice, tomatoes in mostly every meal -- spaghetti and stuff like that, or chili with tomatoes in it. I kept trying to tell them and they kept giving me a hassle.
7. I broke out in hives for about a week. I kept trying to tell the other nurses and they didn't want to talk to me. One of the guards ended up stopping the nurse and made her look at my rash, and that's when she ended up giving me the medication. It was a whole week after I first broke out.
8. Before COVID, it cost \$4 to put money on commissary. Since early April, it costs \$10. They're reaping the benefits off our people.

9. There was someone in my unit who had COVID, and they just put another person with COVID back on this pod. He had it when I was on C-1. They sent him off to another pod, and now two weeks later they put him on this pod, in E-3. He still seems sick and is getting medication. They're still bringing in new people here who are off the street.
10. I just don't feel the same as I was when I first came in. I think I might have had COVID around March 24, when I was in the C-unit, which is an open pod. Mostly everyone I've been in there with, we all got sick. That's when I started drinking the orange juice, and that's when I broke out. I drank it to keep myself healthier. I try to take as much Vitamin C as I can. I was sweating through the night. I had a fever. I kept taking Ibuprofen and Tylenol from commissary. My wife kept telling me to drink hot water. We got some lemon Kool-Aid on commissary, and I was buying those to put in my water to drink before I went to sleep. I was really fatigued and sleeping a lot. I used to work out to try and stay healthy, but I didn't have enough energy to keep working out. My body was hurting super hard. Once my wife told me what to do and take, I was sharing that information. The guards just told us to wear a mask and stay six feet away from them.
11. We started counting and counted 40 deputies that had COVID. They all went to a party and all got it. One of the deputies was talking about it. Two jail doctors and three kitchen workers died from COVID. One lady from commissary had it.
12. Now, the deputies who had it are coming back. They're coughing and sneezing during the night while we sleep. When we wake up and we eat, we don't know if the sneeze landed on the phones. They just openly don't wear the mask, but they tell us they'll lock us down if we don't keep our mask up.
13. One guy who was in C-unit when we were all sick, he couldn't walk. They had him in a wheelchair for about a week. He woke up and was like "man I can't move. I can't get out of the bed." Sometimes he wasn't even eating. He would sleep all day. They didn't move him to quarantine because at that time they wasn't even testing us.
14. When I got to E-unit, they told us that a guy had died from COVID, Michael Meschinski, and had just left the pod. They released him, threw his clothes at him, and made him sign some paperwork. By the time he got to his house in Taylor, he ended up dying in the house. His girlfriend went in the house to find him dead. They told us when I was in C-1 that he passed away. When we moved from C-1 to E-1, I moved right next door to where he had been. They didn't clean his room or nothing. I was scared because I didn't know if he'd touched something. I didn't know what was going on. It was just nasty up in here. It took a whole bunch of us to try to clean it as best we could, even though the guards didn't

want us actually cleaning it. They was telling us to go in our room and shut the door so we couldn't clean. We didn't have masks or anything.

15. On one of our pods, the electricity kept going out. They moved us three times during one day. We moved from E-3 to F-3 to C-1. Everybody was tired. By the time we got to C-1, the deputy was saying something and one of the guys called him a bitch. The deputy got mad and said "who said it?" Nobody said who it was, so the deputy made everybody get in the gym. We were in there for at least twenty minutes. About 40 people. The gym is not that big, maybe a small workout room. It wasn't no six feet. It was two feet, if that, between people. Two people, if not more, were definitely sick with COVID symptoms and we could tell that they were sick. They ended up testing positive for COVID. He endangered all our lives right then and there.
16. They change our masks every two weeks, if that.
17. I was tested on May 9. We keep asking questions about it, but they won't give us any answers. They keep saying "if you haven't been moved, you're alright." They won't tell us the results. They took a nose swab and took our blood. They didn't have us sign consent forms. They had some outside people come in and take our blood. I'm scared because we didn't know what was going on. Two weeks later, after we kept asking them what's going on with the results, they moved two people up out of here. We've been sitting around with them. We've been playing cards with them, everything. We might be back infected. We don't know.
18. They cut the telephone calls off on us, too. They was giving us free COVID-19 phone calls for the people who haven't talked to their family and who don't have money on their phones. And now they cut it off and they haven't been able to talk to their people. It's been a whole month and a half since we haven't had it. Some people inside haven't talked to their families in a month and a half.

This declaration was orally sworn to by Daniel Bryant on June 9, 2020.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to Daniel Bryant on June 9, 2020.

By:

Maiya Moncino

Date: June 9, 2020

DECLARATION OF DARIUS CAMPBELL

1. My name is Darius Campbell, I am 28 years old, and I have been in Division II, Block 306 of the Wayne County Jail since December of 2019.
2. I was tested for COVID-19 about two months ago but I never got the results. I have an underlying condition of bronchitis. When my bronchitis flares up, I have shortness of breath and I can't be around any smoke. We are all scared of getting the coronavirus and have been getting our information through the news. The guards do not tell us anything about COVID-19. They put a poster on the wall to tell us to keep our hands washed but they don't really talk to us about COVID-19 at all.
3. It is incredibly hard to clean our spaces. The guards bring the bucket of cleaning supplies every morning but there aren't any disinfectants, only a mop, a toilet brush, a broom, and a dustpan. We have to fill the bucket with water from the shower but the shower has been broken for a while and we have to ask a guard to turn on the water, which not all the guards know how to do. The mop is also broken so that it doesn't twist to release any water, you can only really move it side-to-side and that doesn't clean anything. There used to be cleaning solution in the bucket but it ran out and hasn't been replaced.
4. There is one phone in our unit for ten people to share. This phone doesn't ever get cleaned. Our common areas are cleaned about once a month by certain guards.
5. We only get our towel and bedroll washed about once every two and a half weeks. We are given one towel to dry ourselves with but if we want a washcloth, we have to buy it from the commissary. To wash our own clothes, we aren't given any laundry soap. We buy laundry soap from the commissary and then we wash our own clothes in the shower and air dry them in the unit.
6. The ventilation in here is bad. None of the windows open and there is just one vent that circulates through two blocks that are next to each other and separated by bars. We never get to go outside.
7. The cells are very close together and if two people reached their hands through the bars, they could touch. Inside my cell, I have a toilet, a bed, and a sink that only has cold water. The cells are very small.
8. We are given soap to clean ourselves with once a week, three little bars that are not antibacterial. I often run out of soap and have to borrow someone else's. We could shower everyday but if you get a guard that doesn't know how to turn on the water, you don't get to shower that day. The shower is supposed to be cleaned every week but it is really more like every nine days. The single shower in our unit is shared by the ten of us.

The shower has black mold in it which doesn't come off even after the officer comes to clean it. There are just toilets in our individual cells and I've seen them overflow on occasion before.

9. It is impossible to socially distance yourself in here. In our common area, there are two tables that fit about four people each. We are always right next to each other when eating meals. The food is prepared by inmates and I don't think they have any protective gear. The only way you can be socially distant is if you never leave your cell.
10. The guards serve us the food but sometimes they mess with it. Last week, there was a problem with one guard who said we were being too loud and when he came back the next morning to serve us food, all ten cakes that were supposed to be our breakfast were just piles of crumbs. It looked like he had purposely run his hands through the cakes to make them inedible.
11. Whenever we ask about COVID-19, the guards get mad at us and threaten to lock us down. We are all upset because we are scared of getting the coronavirus and the guards won't tell us anything. Only some of the guards wear their masks at all times. There are always two or three guards who don't have their masks on during the day and they don't have gloves on when they search us.
12. One time, when we asked a guard where his mask was, he said that he had adapted to the coronavirus because he had already been sick with it. I know of two other guards on this floor who also had COVID-19. We have been given masks about every two weeks. But whenever the inmates don't wear their masks, the guards threaten us with lockdown and threaten to take away our phone and television.
13. I've put in kites for medical treatment but they are not taking them. You have to wait for the right nurse to come in order to even try to get it through. To get a kite to fill out, you have to ask for one but not all the nurses have the blank kites. I put one in a while ago and it was never answered.
14. I heard that the fourth floor was locked down for everyone with COVID-19. I heard that they weren't able to move around really at all. Just recently, they moved someone down from the fourth floor into our unit, which makes me nervous since he was with all the people who are sick.

This declaration was orally sworn to Darius Campbell on June 8, 2020 because Wayne County Jail is not currently permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I, Clara Butler, have read the foregoing in its entirety to Darius Campbell on June 8, 2020.

DECLARATION OF ISAAC EPPS

1. My name is Isaac Epps. I am 55 years old and a press machine operator. My aunts and uncles live in the Detroit area. I also have a son and a granddaughter who live in Detroit.
2. I am currently in Division II of the Wayne County Jail System, on the 10th floor SW. I have been here since April 28th. I'm worried to death every day that I am going to catch the corona. It is starting to weigh on my mental health and has made this a really hostile environment. Everyone I know is scared.
3. I live in a cell with two of us in here. The cell is very small. It's a two-man room but it's not enough for two of us. I'm 6'5" and my bunkie is 6'4" and it's very hard for us to be in there at the same time. I sleep on the bottom bunk and my cellmate sleeps above me. It's the two of us in there, and we have a toilet that's connected to the sink where we get drinking water from. You can tell the toilet is really old because there are always plumbing problems. The same sink that is connected to the toilet is where we get our water. As soon as you let go of the button the water goes off, so you can't wash your hands for more than three seconds. And there are these giant roaches that somehow come through the toilets, and there are water bugs. This is the same water we drink.
4. I have Type 2 Diabetes and sometimes am not able to get my insulin on time. I also have high blood pressure and Hepatitis B. I filled out a kite once because they gave me the wrong dose of blood pressure medication. I only needed 10mg, but they gave me 40mg. My feet swelled up really big and so I filled out the kite, but it took me a week to see the nurse.
5. The medical ward is downstairs, on the second floor. We took an elevator to get there. There were a few of us in the elevator together, which wasn't very big. Even in the medical ward, not everyone was wearing a mask when I went there. It was the only place in the jail where I've seen anyone wear gloves.
6. Even though all of us inmates know that this coronavirus is serious, the guards seem really laid back. Most of the guards say that they aren't the ones who would catch the corona in here, and I don't think they care about us. When we ask for supplies they say that we weren't worried about disinfectants outside, so why bother getting so worked up over it now? But we don't even know if these people in here with us have been tested yet or not, or what their results are.
7. The guards have masks, but they don't always wear them. It's not really possible to socially distance here. We have to eat, and it's impossible for us to not be right next to

each other when we do. It's about 5 inches between the tables where we eat and the phones. Our meals are the same every day: stale corn flakes, corn bread, milk, and the same deli meat sandwich for dinner every day. It's not enough.

8. They tested me for COVID-19 in early May. They took my temperature and my blood but didn't give me any medication. After I was tested, I went back to my cell. I never got my test results, and neither did a lot of the guys I know who got tested when I did. We don't know what that means—if we have it or not. People who refused to get tested were told they'd be sent to the quarantine room, so everyone I know got tested because they didn't want to be sent to the room and catch it. We pay for everything in here—phone calls, video calls, even cleaning supplies that we need. I am scared to get it because of the lack of supplies
9. The guards don't give us the supplies we need. We don't have any hand sanitizer. The showers are flooded every morning. Me and another inmate have taken it into our own hands to try to keep things clean. We sweep the water out of the showers. The showers are filthy after we get rid of the water. We try to scrub it down with what we have, but the smell of mold never goes away. We don't have gloves, even when we clean.
10. The masks they gave us are thin and blue and are hard to keep around your ears. Some guards have the same masks that we have, but some have the good ones that they may have brought from home. Others don't bother wearing masks at all, which puts us in danger.
11. We were given one very thin bar of soap, and they cost about \$1.10 or \$1.25 to replace. We got one roll of toilet paper, and we have to help each other out because commissary runs out of toilet paper all the time.
12. I've been wearing the same clothes and sleeping on the same linen for the past three weeks. The bleach that we get to clean our cell is so watered down that I doubt it does anything but move the filth around. The mop we have is never clean, and the bucket it's in stinks. Still, I try to clean every day because no one else will. No one tells us how often to clean or what to clean, but we try the best we can to keep us safe.
13. There are no windows in my cell. The A/C is always blowing recycled air, and I don't know what's in that air. There are no windows in the common area either.
14. I try to wipe down the tables every morning because so many people touch them. The chairs are bolted into the ground and the chairs are connected to them, so we're all next to

each other when we eat. The phones and tablets are also probably where a lot of the spread might happen.

15. I know that some people who were sick were sent down to a floor on the Old Side. That's where they send people who have the virus. I only know this because some guys on my floor went downstairs on their way to court and saw a sign that said that it was a corona quarantine room. I don't know who's down there, though.

This declaration was orally sworn to Issac Epps on June 10, 2020 because Wayne County Jail is not currently permitting documents to be exchanged for signature.

Under penalty of perjury, I declare that I, Faiz Pirani, have read the foregoing in its entirety to Isaac Epps on June 10, 2020.

DECLARATION OF JAMES ANTHONY

1. My name is James Anthony. I am 32 years old. I have been detained at Wayne County Jail, in Division III, since May 10. I'm in Unit F-1.
2. I have asthma, bronchitis, and emphysema. I've been having chest pain. I told the nurse, and she gave me these inhalers. They work from time to time, but not really like I need them to work. It takes too long for my chest to stop hurting. On the outside, I use a Symbicort inhaler. These inhalers are a Vasco. I'm trying to get on the Albuterol inhaler, but the person I really need to see, the head physician, is not here. I don't know why. The deputies tell me to put in a kite. That's it.
3. I'm worried about catching the virus because I've got asthma. The first thing that gets hit is the airway passages to your lungs, and it shuts off your breathing.
4. I'm really worried about corona transmission from food because I'm not watching the people that's making the food. I don't know if they've been checked. I don't know what's going on.
5. It's nasty as hell in here. Nothing gets wiped down. It's messed up. Showers are nasty. I've seen mold in the showers, and they don't have nothing to clean that with. I'm breathing in the mold and getting that into my lungs. The showers don't get cleaned. We don't have no real cleaning supplies in here. They're not doing nothing to help us in here.
6. You know this place is dirty, and we don't have access to bleach. We have access to Simple Green. We don't have anything that can actually defeat the virus. Simple Green is a cleaning product but it's not like bleach. Simple Green is for taking stains off of stuff. If you had a ceramic tile floor and you spilled some Kool-Aid on it, that's what Simple Green would be for. It's not something to actually clean a phone with or clean a table with. Wiping it down with Simple Green is just defeating the purpose. It's not good. I don't feel good about it at all.
7. The sheriffs walk around with no masks and they be telling us to pull our masks up. It's crazy. What if they bring it in here to us? Just because your temperature gets checked, don't mean that you can't be a carrier. We have to wear our masks for two weeks before they change them.
8. Laundry is once in a blue moon.

9. There's six phones on my block. And whoever uses the phone, they're not wiping them down. They're not doing nothing. The phones are cleaned probably once a night. When people go to talk, they take their face masks down and talk on the phone. And then the next person puts their hand on it. We have Simple Green to clean it, but no real stuff to defeat a virus. Sometimes that Simple Green is even watered down.
10. To clean, we get these little bars of soap that irritate my skin. It makes my skin itchy and dry. It takes out all the moisture out of your skin and it makes me itchy and dry and I end up itching my skin down to where I constantly bleed. That's how bad I scratch my skin.
11. I was tested for COVID-19 on June 9. It's messed up that I'm just now getting the test. I'm really worried about the spread, because I could have it.

This declaration was orally sworn to by James Anthony on June 9, 2020.

Under penalties of perjury, I declare that I have read the foregoing in its entirety to James Anthony on June 9, 2020.

By:

Maiya Moncino

Date: June 9, 2020

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

WAYNE COUNTY JAIL INMATES et al.,

Case No. 71-173217-CZ

Plaintiffs

Hon. Timothy M. Kenny

v

WILLIAM LUCAS et al.,

Defendants.

SUPPLEMENTAL AFFIDAVIT OF ADAM LAURING

Adam Lauring, being first duly sworn on oath, deposes and says:

A. Materials Reviewed:

1. On May 26, 2020, I reviewed results of COVID-19 infection and antibody tests conducted on Wayne County Jail (“Jail”) Detainees in early-mid May. The results indicated the following:

171 of 689 unique people are currently infected with COVID-19 or tested positive for antibodies.

Both (virus and antibodies) – 46

Only Virus – 14

Only Antibodies – 116

Total – 176/689

2. On June 7, 2020 I reviewed in full the policy documents, court orders, and affidavits submitted as Exhibits 1-10 to the Defendants’ brief.¹
3. On June 9, 2020 I reviewed the Inspection Report of Dr. Fred Rottnek.
4. On June 11, 2020 I reviewed the affidavits of Bridgette Jones and Louis Shicker and the supplemental declaration of Mark Morrissey.

B. Supplemental Information About My Background and Expertise in Infectious Diseases

¹ A complete list of the policy documents, court orders, and affidavits which I reviewed are attached hereto as Exhibit A.

5. I received my medical degree from the University of Washington in 2002. I subsequently trained as a Resident in Internal Medicine at the University of California, San Francisco (UCSF) – one of the country’s top academic medical centers. In recognition of my skills as a clinician and teacher, I was selected by the faculty and my peers to serve as Chief Medical Resident.
6. I subsequently trained as a Fellow in Infectious Diseases and have been Board Certified in Infectious Diseases (American Board of Internal Medicine) since 2008. I have practiced as an Infectious Diseases specialist, first at UCSF, and since 2012, at the University of Michigan.
7. I completed a PhD in Molecular and Cellular Biology at the University of Washington in 2000. My thesis research was on how viruses like HIV cause disease. I performed post-doctoral research in virus evolution from 2007-2012. I have directed a research laboratory at the University of Michigan since 2012. I continue to study how viruses evolve and spread with a focus on influenza and other respiratory viruses. Based on my scientific success and track record of innovation, I have received several highly competitive awards, including: the Pfizer Young Investigator Award in Vaccine Development, a Doris Duke Charitable Foundation Clinician Scientist Development Award, and a Burroughs Wellcome Fund Investigator in the Pathogenesis of Infectious Disease Award.
8. I participate in the US Hospital Vaccine Effectiveness Network and the US Influenza Vaccine Effectiveness Network, two large CDC-funded studies of influenza virus epidemiology in communities and healthcare environments. I am the Principal Investigator on a 5-year, \$3.7 million NIH grant on respiratory virus transmission, which recently scored in the top percentile and is expected to begin on July 1, 2020.
9. I am currently an Associate Professor with Tenure in the Division of Infectious Diseases and the Department of Microbiology and Immunology at the University of Michigan.
10. In 2019, I became a Fellow of the Infectious Diseases Society of America, an honor given to individuals who have demonstrated excellence in Infectious Diseases. In 2020, I was elected to the Governing Council of the American Society for Virology.
11. I cared for one of the first two patients with COVID-19 in the State of Michigan on March 10, 2020. I watched Governor Whitmer announce these first cases while at the patient’s bedside in the intensive care unit at the University of Michigan Hospital. From mid-March through the end of May, I spent 5 weeks taking care of COVID-19 patients at the University Hospital. Most of the patients were in the Intensive Care Units.
12. Since March, I have been instrumental to the University’s response to COVID-19. I developed our diagnostic and testing guidelines, contributed to institutional treatment guidelines, and worked closely with hospital infection control to manage patient flow

over the first two weeks of the Michigan epidemic. I helped to set up our Regional Infection Containment Unit (RICU), a dedicated COVID-19 intensive care unit.

13. My laboratory performed key experiments for a University of Michigan N95 disinfection project, which informed the hospital's decision to process masks for re-use at a time of critical PPE shortages (<https://www.medrxiv.org/content/10.1101/2020.04.28.20084038v1>). We are in the process of sequencing SARS-CoV-2 specimens from 400 patients and 250 health care workers, with the goal of understanding COVID-19 transmission and spread.
14. I helped to set up the Medical Center's COVID-19 Patient Registry and the COVID-19 Biospecimen Repository. I serve on the University's COVID-19 Research Prioritization Committee and COVID-19 Clinical Trials Feasibility Review Committee. I also serve on the Institutional Biosafety Committee, which reviews all protocols for pathogen research at the University of Michigan. I am Co-Director of the University's new Michigan Center for Infectious Disease Threats.
15. Based on my training, my expertise in respiratory virus transmission, and my deep and varied experiences with SARS-CoV-2 and COVID-19, I am very well qualified to comment on many aspects of this case, including: basic biology of SARS-CoV-2 and methods for its inactivation; how this virus transmits from person to person and spreads through communities, healthcare settings, and congregate environments; infection control procedures; COVID-19 epidemiology; diagnostic tests for COVID-19; and clinical care of patients with COVID-19.

C. Summary of Supplemental Findings and Recommendations:

16. My review of the above-listed information and materials does not change my previous findings, opinions, and recommendations as set forth in my initial Declaration, and I reiterate the need to act swiftly.
17. In addition to my previous recommendations, after reviewing the information enumerated in ¶¶1-3 in conjunction with my expertise in virology – particularly the evolution and transmission of RNA viruses – and my recent and ongoing research on the evolution and transmission of COVID-19, it is my professional judgment that:
 - a. Some of the Jail's policies, directives, orders, and guidance are grossly inadequate;
 - b. If the following recommendations by Dr. Rottnek are not immediately followed, the detainees in each division of the Wayne County Jail, and particularly Division II, are at high risk of suffering from preventable infection, serious illness, and death:
 - i. Continue reducing the population in all three facilities as quickly as possible, so that medically vulnerable populations have fewer exposures to

potentially deadly coronavirus and social distancing measures can be better followed by those remaining in physical custody.

- ii. Discontinue housing inmates and staffing of workers in the secured areas of Division II as soon as possible. This environment is unsafe for more reasons than COVID-19. Dr. Rottnek notes that it appears that black mold or mildew flows from the buttons controlling water flow. This is a potential health hazard. Dr. Rottneck also reports that vents in cells are usually at least partially blocked by dirt and airborne dust. Poorly ventilated spaces will place inmates at increased risk for COVID-19 and other respiratory infectious diseases (e.g. influenza, tuberculosis).
- iii. Follow the Centers for Disease Control and Prevention (CDC) Interim Guidance on the Management of Coronavirus Disease 2019(COVID-19) in Correctional and Detention Facilities, <https://www.cdc.gov/coronavirus/2019-ncov/community/correction-detention/guidance-correctional-detention.html>
- iv. Increase regular and as-needed testing for COVID-19 infection for inmates, staff, and any other visitors.
- v. Post and distribute to all stakeholders up-to-date education about prevention, spread, and treatment of COVID-19. This information should also include the definitions and importance of social/physical distance, and the use of personal protective equipment (PPE).
- vi. Post schedules for cell and common space cleaning with CDC-approved disinfectants that kill coronavirus.
- vii. Adjust medical services to meet the demand of this population during the pandemic. Stop disincentivizing inmates from sick call and seeking assistance.
- viii. Provide aftercare planning to inmates so that they are aware of practices to safely return to their homes and communities, since many have been exposed to COVID-19.

D. Test Results

18. The results of testing conducted May 7-9 revealed that 60 detainees out of 689 unique detainees tested positive for SARS-CoV-2, the virus that causes COVID-19. This indicates recent or current infection. Including the 116 detainees who tested positive for antibodies (past or current infection), the total rate of infection was 25%.

19. According to the Affidavit of Mark Morrissey, the regional director of Wellpath, of the 939 total tests conducted, 85 detainees tested positive (9%). At the outset, I note two issues with his attestations. First, it is unclear whether the tests are for the virus or antibodies (serology), when all of the tests were performed, and why the numbers are different from those reported in paragraph 1. These data cannot be accurately analyzed without that information. That being said, by any standard, the rate of infection within the Wayne County Jail is high.
20. Second, in his affidavit, Mr. Morrissey states that positive tests “appear to be lower than what is the general public.” His statement is incorrect. According to the New York Times COVID-19 tracker, as of June 8, there have been 21,455 cases of COVID-19 in Wayne County. This corresponds to 1,218 per 100,000 people in Wayne County, or 1.2%. These estimates are supported by data from the Michigan Department of Health and Human services, accessible at <https://www.mistartmap.info>. Using Mr. Morrissey’s report of the data, then, the rate of infection in the Wayne County Jail is almost 10 times higher than the general population in Wayne County. Using the actual testing data provided (paragraph 1), the rate of infection in the Wayne County Jail is 20 times higher than what has been reported for the general population in Wayne County.
21. Whether the rate of infection in 10 or 20 times that of the public population in Wayne County, the results suggest that the Jail is not practicing all of the mitigation and prevention efforts set forth in the directives, orders, and policies adopted since March 13, 2020.
22. Further, the results upon which Mr. Morrissey relies are now more than one month old. Because of the rate at which COVID-19 spreads, and the Jail’s failure to practice the most basic protective measures – e.g. adequate access to soap, protective wear, physical distancing, exposure to open toilets, adequate sanitization of high-touch surfaces and shared spaces – the rate of infection, at this point, might be undercounted. Without retesting the entire population, it is impossible to know the infection rate.
23. Mr. Morrissey’s misleading analysis and misreading of the results raises serious questions about his understanding of COVID-19 and the diagnosis of infectious diseases. In turn, it raises serious questions about the standard of medical care provided to detainees as the Wayne County Jail.

E. Affidavits of Bridgette Jones and Louis Shicker

24. Ms. Jones and Dr. Shicker make the same statistical error as Mr. Morrissey did in his affidavit and arrive at the same incorrect and misleading conclusion. In paragraph 18, she states, “Based on this statistic, it would appear that around 10% of the test population at the Wayne County Jail was positive, yielding decreased positivity rates to that of the community and other comparable correctional facilities.” I will reiterate, the “test population” at Wayne County jail was all inmates. Therefore, it was a true survey of the entire population. The relevant comparator, would be all residents of Wayne County. The 10% statewide estimate cited by Ms. Jones, Dr. Shicker, and Mr. Morrissey appears to be

the number of positive nucleic acid tests in the State of Michigan divided by the number of tests performed. While we don't know the exact infection rate in Wayne County or the State of Michigan, a more valid comparison would be to divide the number of positive tests/cases in Wayne County by the total population of Wayne County. As above, this gives a value of 1.2%, nearly ten-fold lower than estimated in the Wayne County jail.

25. Ms. Jones and Dr. Shicker highlight a number of policies and directives issued by Wayne County jail officials, dating back to March 13. This was 3 days after the first cases diagnosed in the State of the Michigan. Given that their testing on May 9 indicates an infection rate nearly 10-fold higher than that in Wayne County, I would suggest that these measures either have not been implemented or have been ineffective at limiting the spread of this infection in the jail.
26. In response to paragraph 20 of Ms. Jones's affidavit and paragraph 21 of Dr. Shicker's affidavit, I should make clear that my expert opinion derives not only from my review of the CDC guidelines for correctional facilities, but from by extensive experience in respiratory viruses and other infectious diseases, as documented in paragraphs 5-15 of this affidavit.
27. As above, Ms. Jones' statement of "decreased positivity rates" (paragraph 22) is incorrect and misleading. Accordingly, I strongly disagree with her conclusion that, "the risk of transmission was minimized." The same is true for Dr. Shicker's similar statements (paragraph 23). It is also my professional judgment that detainees should not be double bunked because double bunking increases the likelihood that the virus will spread.
28. I agree with Ms. Jones and Dr. Shicker that social distancing can be achieved in many ways. However, nearly all guidelines require that a distance of 6 feet in all directions be maintained. This is because it is believed that respiratory droplets produced when a person breathes, talks, coughs, or sneezes can up to travel up to six feet
29. As above, and for the reasons stated in my earlier declaration, Ms. Jones and Dr. Shicker are incorrect in their judgement that "inmates placed in any division of the Jail are not at a significantly higher risk of infection for COVID-19 when compared to the population in the community."
30. As Ms. Jones participated in the development of the CDC guidelines for correctional facilities, she should be aware that the guideline states, "Although social distancing is challenging to practice in correctional and detention environments, it is a cornerstone of reducing transmission of respiratory diseases such as COVID-19."
31. I agree with Ms. Jones and Dr. Shicker that it appears that "Wayne County Jail began issuing policies and directive to address the pandemic," but as stated earlier, the infection rate suggests that the Jail is not practicing all of the mitigation and prevention efforts set forth in the directives, orders, and policies adopted since March 13, 2020. Further, Dr. Rottnek, in his report, stated that he observed non-compliance with some critical policies.

And, for the reasons discussed in section “F” it is apparent that some of the policies are dangerously inadequate.

F. Jail Policies, Directive, Orders, Memoranda

32. In reviewing directives from the Wayne County Sheriff’s Office to Wayne County Jail staff, it is apparent that as early as March 13, 2020, Wayne County officials were aware of the necessity of protective measures. The March 13 Directive sets forth protective measure for staff, consistent with CDC guidelines, to be “immediately implemented”:
 - a. Donning protective clothing: Tyvek suits, N-95 Respirator Masks, goggles, and gloves;
 - b. Providing masks to detainees with suspected infection;
 - c. The important of distancing
 - d. Frequent handwashing for at least 20 seconds;
 - e. Use hand sanitizer if soap and water is unavailable;
 - f. Use a tissue when you cough or sneeze;
 - g. Clean and disinfect frequently touched surfaces daily; and
 - h. Stay home if staff is sick.

33. The policies are dangerously inadequate for the following reasons:
 - a. They fail to provide for mechanism to achieve meaningful social distancing between detainees;
 - b. They fail to provide any added protection for medically vulnerable detainees for whom the risk of serious illness or death is much greater;
 - c. The surgical masks provided every two weeks (per the April 10 Directive) are single use. They are not designed to be worn beyond one or two days, and after that time, they will not prevent or mitigate the spread of infection.
 - d. They fail to reliably identify infected staff. Reliably identifying COVID-19 infections amongst staff is critically important to preventing the spread of COVID-19 inside the Jail because they cycle in and out of the facility daily which increases their likelihood of exposure and bringing the infection inside of the facility at the start of each shift. As set forth in the April 14 General Memo, mandated staff testing was extremely limited. Presently, the Jail appears to be using a symptom and exposure-based approach to identifying infections. As up to 40% of people transmit prior to the onset of symptoms, this approach fails to identify contagious carriers in almost 1 in every 2 cases.
 - e. They fail to ensure detainees have access to: adequate soap for handwashing, clean laundry, disinfectant and cleaning products for high-touch surfaces and shared spaces, adequate protective wear, Kleenex or tissue.

- f. Directives from March 20, 21, and 27 for identifying infection and quarantining detainees, as well as the new June 2 inmate testing protocol are inadequate. The incubation period for COVID-19 is 4-7 days. Thus, depending on the date of infection, the 72-hour initial intake quarantine period may not assist in reliably identifying infection. Nor will it assist with identifying pre-symptomatic or asymptomatic infected persons. For the same reason, the intake testing may not reliably identify infection. A follow-up test 14 days later, as ordered, will reliably identify infection, but, according to the written policies, at that point the detainee will no longer be in quarantine and, if infected, will likely have infected other detainees and/or staff. This is particularly true if the detainee is asymptomatic. 40% of infections are the result of asymptomatic carriers.
- g. The frequency with which detainees receive clean clothing and towels creates a heightened risk that infection will spread.

G. The Inspection Report of Dr. Fred Rottnek

34. The following conditions, as observed by Dr. Rottnek, seriously increase the risk and spread of infection (for the reasons outlined in my initial declaration):
- a. Social distancing is impossible for detainees at Division II;
 - b. Social distancing is impossible for staff doing rounds at Division II;
 - c. Lack of physical barriers on front cell walls at Divisions I and II allow for aerosolized respiratory droplets to freely pass from one cell to another;
 - d. Staff and detainees inconsistently wear personal protective wear, including masks. And, in many instances, neither staff nor detainees correctly donned face masks. Particularly troubling is Dr. Rottnek's observation of two staff members in the medical unit "sitting at their desk, shoulder-to-shoulder, about a foot apart, and they were not wearing [masks];
 - e. Medical units in Divisions I and II are understaffed, and the medical treatment in Division II falls below a basic standard of care.
 - f. Kitchen staff in Division I reported that the kitchen is cleaned only once daily;
 - g. Irregular clean laundry;
 - h. None of the staff knew how to don plastic suits;
 - i. Reports of insufficient access to cleaning supplies and personal hygiene products, such as soap, disinfectant, and cleaning supplies, matched the attestations in the declarations I reviewed more than one month ago, which indicates that Jail has

failed to take the necessary steps to provide detainees with these products and supplies consistent with CDC standards, and

- j. Insufficient information about measures to protect against infection or instructions for adequate cleaning.

35. I agree with all of Dr. Rottnek's recommendations and I most strongly agree with his recommendation to "**stop housing inmates in Division II as soon as possible**. And then stop requiring staff to work there." Rottnek Report, p. 12. I strongly disagree with Ms. Bridgette Jones's and Dr. Louis Shicker's judgment on this issue, I would also add that the medically vulnerable detainees housed in Division II must be moved immediately. Poor ventilation and extensive disrepair creates an unreasonable risk infection of airborne illnesses, and, as Dr. Rottnek further noted, once a person is infected, the conditions create a grave risk of serious illness or death because they exacerbate respiratory conditions and chronic conditions. Further, the sub-par medical care for non-COVID-19-related health problems strongly indicates that Jail staff remains ill-equipped and unprepared to manage and prevent a further outbreak of COVID-19 and any related complications. And, notwithstanding the fact that the medical care is deficient, and the conditions increase both the likelihood of infection and the risk of severe consequences from infection, detainees are incapable of achieving social distancing and are not receiving sufficient hygiene supplies.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

FURTHER DEPONENT SAYETH NOT.



Adam Lauring, MD, PhD

June 10, 2020

APPENDIX I

**Defendants' Motion To Strike The Report Of
Fred Rottnek, M.D., MAHCM**

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

WAYNE COUNTY JAIL INMATES et al.,

Case No. 71 173 217 CZ

Plaintiffs

Hon. Timothy M. Kenny

v

WILLIAM LUCAS et al.,

Defendants.

**BRIEF IN SUPPORT OF
DEFENDANTS' MOTION TO STRIKE THE REPORT OF FRED ROTTNEK, M.D.,
OR, IN THE ALTERNATIVE, TO REDACT**

1. INTRODUCTION.

The report of Plaintiff's expert, Fred Rottnek, M.D., must be stricken from the record in this case, or in the alternative, redacted because: 1) his report exceeds the scope of the Order governing the inspection and 2) because Dr. Rottnek's opinions are inadmissible. He lacks a specialty like infectious disease or immunology to provide expertise regarding COVID-19. Additionally, his opinions are not reliable or relevant. He did not review the measures that the Wayne County Jail had implemented to combat COVID-19. His opinions lack any relevance. His repeats allegations of Plaintiffs. He fails to connect his expertise to the facts of this case. An expert's opinions are not relevant if the expert acts merely as a conduit for other sources, such as CDC Guidelines and inmate statements. The Court, the jury, and the parties may consider these themselves. They don't require a witness with the Court's imprimatur afforded an "expert" to give an implication that the witness' additional weight to these sources.

2. FACTS AND PROCEDURAL HISTORY

After the May 14, 2020 status conference in this matter, this Court entered an order, dated May 15, 2020, governing the inspection of Plaintiff's chosen expert, Fred Rottnek, M.D. Dr. Rottnek was to evaluate "Jail conditions insofar as they directly relate to the health and safety of detainees in the context of COVID-19." ("The Order") **Ex A**, ¶ 3. The Order provided that, after his inspection, Dr. Rottnek was to submit a report to counsel for the parties and to the court. **Ex. A**, ¶ 4.

The Order further provided for the scope of Dr. Rottnek's Report. The Order provided:

The Report shall include:

- Conditions of the housing units during the COVID-19 pandemic;
- Conditions of and access to shower/bathroom facilities during the COVID-19 pandemic;
- Conditions of and access to medical, laundry, dining facilities and shared common areas during the COVID-19 pandemic;
- Availability and stock of cleaning supplies and personal protective equipment for inmates and Jail staff;
- Availability and stock of hygienic and disinfecting supplies for inmates and Jail staff;
- Availability of communications to inmates about COVID-19 including low-literacy and non-English-speaking people; and
- Social distancing measures.

Ex A, ¶ 7

Dr. Rottnek is neither board certified in immunology or in infectious disease. He is board certified in family medicine and addiction medicine. Dr. Rottnek is a fellow of the American Academy of Addiction Medicine and of the American Academy of Family Physicians. (**Ex B**, p 2). Admittedly, Dr. Rottnek has published and presented on the topic of a particular epidemic,

specifically, **opioid addiction**. **Ex B**. However, Dr. Rottnek has not published or presented on any type of virus, let alone a virus pandemic.

Predictably, then, Dr. Rottnek does not base his opinions upon any medical science. Instead, his sole source is the United States Center for Disease Control and Prevention's Interim Guidelines on the Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities. **Ex C**, ¶ 3(b). This publication lists guidelines to be implemented by jails and prisons. It does not provide hard and fast rules that must be followed by every facility across the country. The CDC recognizes the unique challenges presented by each facility in each community. The CDC begins its publication this way:

This document is intended to provide guiding principles for healthcare and non-healthcare administrators of correctional and detention facilities (including but not limited to federal and state prisons, local jails, and detention centers), law enforcement agencies that have custodial authority for detained populations (i.e., US Immigration and Customs Enforcement and US Marshals Service), and their respective health departments, to assist in preparing for potential introduction, spread, and mitigation of COVID-19 in their facilities....

This guidance will not necessarily address every possible custodial setting and may not use legal terminology specific to individual agencies' authorities or processes. **The guidance may need to be adapted based on individual facilities' physical space, staffing, population, operations, and other resources and conditions.** Facilities should contact CDC or their state, local, territorial, and/or tribal public health department if they need assistance in applying these principles or addressing topics that are not specifically covered in this guidance.

Ex D, p 1 (emphasis in original).

The CDC itself recognizes that its guidelines (i.e., not mandates) are to be adopted as needed by local officials based upon the physical layout of a jail, staffing levels, and jail population, among other factors.

Curiously, Dr. Rottnek did not take advantage (either prior to his inspection or after it), to review the directives issued and measures taken by the Jail to address the COVID pandemic.

Neither did Dr. Rottnek review the stipulated Order entered by this Court on May 18, 2020, regarding measures that the Jail had already adopted and that Plaintiffs' counsel requested be memorialized in an order of the court.

Dr. Rottnek completed his inspection of the Jail on May 16, 2020. Dr. Rottnek admits that he failed to perform one of the tasks required in the Order. He states in his report: "I did not explicitly ask to see stocks of cleaning supplies, hygienic supplies, or PPE, so I did not see the inventories. I apologize for this oversight." **Ex C**, ¶ 5(d)(i). Despite this admission, Dr. Rottnek provides opinions regarding these supplies, such as his statement that the "Simple Green" cleaner used by the jail is not approved for use in preventing COVID-19. If he would have looked at the stocks of cleaning supplies, he would have realized that this product was "Simple Green d Pro 3 Plus," a disinfectant approved by the EPA for use against COVID.

Dr. Rottnek's Report exceeds the scope of the Order. It includes his recommendation to: "stop housing inmates in Division II as soon as possible." **Ex C**, ¶ 7(i). This recommendation goes well beyond the risk of COVID-19 transmission and is based upon the "pervasive disrepair, irregular surfaces, rust, paint peeling..." etc. **Ex C**, ¶ 7(i). His report also considers the adequacy of medical care for diseases other than COVID-19. **Ex C**, ¶ 7(iv).

His report also includes personal identifying information that is private and protected by HIPAA. It lists names of inmates who are housed on the psychiatry floor and quarantine units. **Ex C**, ¶ 4.

3. LAW AND ARGUMENT

The Rules of Evidence, Michigan statutes, and case law universally mandate that trial courts rigorously exercise its role as gatekeeper for consideration of expert opinions. MRE 702;

MCL 600.2955; *Krohn v Home-Owners Ins Co*, 490 Mich 145, 167; 802 NW2d 281 (2011). The function must be exercised “at all stages of a proceeding.” *Krohn*, supra 490 Mich 167.

Because Dr. Rottnek fails to demonstrate an expertise in the subject he purports to render an opinion on (the spread of COVID-19). He fails to show that his opinions are reliable – they are based on a paucity of material and he fails to properly investigate the subjects of his recommendations. Dr. Rottnek’s opinions are also no relevant. They will not assist the Court or the trier of fact. They merely mimic the guidelines of the CDC, a document that all can read. His opinions also seek to amplify the allegations of Plaintiffs. Dr. Rottnek’s report contains complaints by Plaintiffs, inmates at the Wayne County Jail. These allegations should stand on their own, and not be repeated through the conduit of Dr. Rottnek. The problem with permitting an “expert” to relay the statements of the CDC or Plaintiffs themselves is that it provides an “imprimatur” by the Court upon a statement by the source. The statements of the CDC and the Plaintiffs should succeed or fail based on the statements themselves and should not be given extra credibility because they are echoed by Plaintiffs’ expert.

In the event that the Court does not strike his entire report from the docket, the Report must be redacted to exclude those recommendations that exceed the scope of the Order – namely, the recommendations that have no connection with COVID-19. The Report must also be redacted to exclude the personal identifying information of inmates at the Wayne County Jail, including the names of inmates on the mental health unit and in COVID quarantine.

A. This Court Must Exercise Its Gatekeeper Function Re Expert Opinions At All Levels of Proceedings.

Consistent with federal law, Michigan law demands that trial courts exercise its role as a gate-keeper to preclude the admission of opinion testimony that is not based upon adequate

expertise, that is not reliable or that is not relevant. The law regarding expert testimony is found in the Michigan Rules of Evidence, the Michigan Statutes, and in federal and state case law.

The Michigan Rules of Evidence provide:

If the court determines that scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education may testify thereto in the form of an opinion or otherwise if (1) the testimony is based on sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3) the witness has applied the principles and methods reliably to the facts of the case.

MRE 702

This rule makes clear that the trial court must make two initial determinations. First, a trial court must determine if the “specialized knowledge will assist the trier of fact to understand evidence or to determine a fact in evidence.” Then, the court must determine if the expert is “qualified ... by knowledge skill, experience, training, or education.” Only after these two threshold determinations are made, a court must only admit testimony that is reliable because it is 1) based on sufficient facts or data, 2) the product of reliable methods, and 3) because the witness applied the methods reliably to the facts at issue in the case.

As noted by the Michigan Supreme Court, “MRE 702 incorporates the standards of reliability that the United States Supreme Court articulated in *Daubert v Merrell Dow Pharms Inc*, 509 U.S. 579 ... (1993). *Elther v Misra*, 499 Mich 11, 22; 878 NW2d 790 (2016). MRE 702 demands a searching inquiry. *Gilbert v DaimlerChrysler Corp*, 470 Mich 749, 782; 685 NW2d 391 (2004). “Each aspect” of an expert’s proffered testimony requires this inquiry. *Id* at 779.

Under *Daubert* and the MRE 702, there are two requirements for admissibility of each aspect of the purported expert testimony: it must be relevant, and it must be reliable.

Elher, supra, 499 Mich at 22-23. The proponent bears the burden to establish that the testimony is admissible. *Gilbert, supra*, 470 Mich at 781.

MCL 600.2955 provides guidance as to factors the trial court may consider in determining whether expert testimony is reliable. The statute provides:

- (1) In an action for the death of a person or for injury to a person or property, a scientific opinion rendered by an otherwise qualified expert is not admissible unless the court determines that the opinion is reliable and will assist the trier of fact. In making that determination, the court shall examine the opinion and the basis for the opinion, which basis includes the facts, technique, methodology, and reasoning relied on by the expert, and shall consider all of the following factors:
 - (a) Whether the opinion and its basis have been subjected to scientific testing and replication.
 - (b) Whether the opinion and its basis have been subjected to peer review publication.
 - (c) The existence and maintenance of generally accepted standards governing the application and interpretation of a methodology or technique and whether the opinion and its basis are consistent with those standards.
 - (d) The known or potential error rate of the opinion and its basis.
 - (e) The degree to which the opinion and its basis are generally accepted within the relevant expert community. As used in this subdivision, “relevant expert community” means individuals who are knowledgeable in the field of study and are gainfully employed applying that knowledge on the free market.
 - (f) Whether the basis for the opinion is reliable and whether experts in that field would rely on the same basis to reach the type of opinion being proffered.
 - (g) Whether the opinion or methodology is relied upon by experts outside of the context of litigation.

B. Dr. Rottnek May Be A Specialist in Addiction Medicine, not Infectious Disease or Other Expertise Related to COVID.

An examination of Dr. Rottnek's curriculum vitae fails to demonstrate that he has expertise in an areas of science that would assist the Court in evaluating the issues in this case. Thus, his purported expert testimony must be excluded because his testimony fails one of the threshold inquires in MRE 702: he is not qualified "by knowledge, skill, experience, training, or education" to render an expert opinion on COVID-19.

Dr. Rottnek currently serves as Professor of Family and Community Medicine at St. Louis University in St. Louis, Missouri. **Exhibit B**, p 1. His specialty appears to be addiction and recovery, especially as it relates to the opioid crisis. He serves as the Program Director of the St. Louis University Addiction Medicine Fellowship. *Id.* He is the Medical Director of the Assisted Recovery Centers of America. *Id.* He also serves as a consultant to the Missouri Department of Mental Health, Opioid State-Targeted Response, Opioid Crisis Management Team. *Id.* While Dr. Rottnek did serve as the contracted medical director and lead physician for the St. Louis County Department of Health: Corrections Medicine, there is nothing in his cv that would suggest that he is uniquely equipped to speak about the novel coronavirus 2019, how this specific coronavirus spreads and the science of combatting it. He lacks board certifications in infectious disease.

Dr. Rottnek is a board certified in addiction medicine and family medicine. He is a fellow of the American Academy of Addiction Medicine and of the American Academy of Family Physicians. **Ex B**, p 2. He is a Certified Correctional Health Professional by the National Commission on Correctional Health Care. *Id.* Dr. Rottnek is a member of the Association of Medical Education and Research in Substance Abuse, Physicians for Human Rights, the American Society of Addiction Medicine, the Society of Correctional Physicians, Heath Care for the Homeless Network, and the American Academy of Family Physicians. *Id.*, pp 2-3. He currently

teaches courses about the opioid epidemic, pain substance abuse and clinical interviewing. *Id*, p 6.

Dr. Rottnek's cv lists his research grant projects. He is currently researching Peer to Peer Recovery Community Service Program, Addiction Medicine, Opioid Workforce Expansion, and Assisted Recovery Centers of America. *Id* p 8. No coronavirus topics are listed as research projects past or present. Similarly, the cv also lists Dr. Rottnek's publications and presentations. While the publications and presentations listed appear to be mainly concerned with addiction and recovery, none of them appear to be about immunology, infectious diseases or coronaviruses.

The fact that an witness possess specialized knowledge in one area of scientific inquiry does not qualify him as an expert in unrelated subject. *Gilbert* 470 Mich at 789. In short, while Dr. Rottnek may qualify as an expert on the opioid epidemic, he lacks expertise on the matter he is put forward to render opinions on – the COVID-19 pandemic. Therefore, his testimony should be excluded and his report sticken.

C. Dr. Rottnek's Opinions Are Not Reliable.

In this case, Dr. Rottnek took a mere slice of the available information prior to conducting his inspection of the Jail and making her recommendations. Dr. Rottnek admits that the only two documents he relied upon were the Court's Order of May 15, 2020, and the CDC guidelines. Dr. Rottnek fail to review any of the material provided to Plaintiffs' Counsel regarding the measures taken by the Wayne County Sheriff's Department and Jail Medical to combat COVID-19. He relied exclusively on his observations and the allegations relayed to him by inmates he encountered during his tour. There was no inquiry to check the facts underlying the allegations.

Even a "supremely qualified expert cannot waltz into the courtroom and render opinions unless those opinions are based upon some recognized scientific method and are reliable and

relevant under the test set forth by the Supreme Court in *Daubert*.” *Clark v Takata Corp*, 192 F3d 750, 759, n 5 (CA7 1999).

Courts have noted that an expert’s failure to adequately account for obvious alternative explanations bears on the lack of reliability of an expert’s testimony and supports exclusion. *Claar v. Burlington NRR*, 29 F3d 499, 502 (CA 9 1994). In this matter, not only did Dr. Rottnek not account for the Jail’s actions, he failed to even inquire into them.

Further, by his own admission, Dr. Rottnek failed to even look at the jail’s “stocks of cleaning supplies, hygienic supplies, or PPE. I apologize for this oversight.” **Ex C**, ¶ 5(e), p 7. Therefore, no opinion he provides regarding these materials can be admitted. They are not based upon sufficient facts.

This unreliability is demonstrated by the fact that Dr. Rottnek erroneously states that the Jail uses simple green as a disinfectant. **Ex C**, ¶ 5(f)(ii), pp 7-8. If Dr. Rottnek has looked at the materials, he would have learned that the jail uses, Simple Green d Pro 3 Plus.

The methodology used by Dr. Rottnek to form his recommendations appears to be that he took the hearsay statements of the inmates at face value and applied them to the CDC guidelines. Where there is “too great an analytical gap” between the data and the opinion proffered, a court may exclude the testimony as unreliable. *Gen Elec Co v Joiner*, 522 US 136, 146 (1997).

D. Dr. Rottnek’s Opinions Are Not Relevant.

Additionally, Dr. Rottnek’s opinions are not relevant. In order to be admitted, the proffered expert testimony must be both reliable **AND** relevant. *Elher, supra*, 499 Mich at 22-23. An expert’s opinion testimony must be “relevant to the task at hand.” *Daubert v Merrell Dow Pharm Inc*, 43 F3d 1311, 1315 (CA 9, 1995) (“*Daubert II*”). Relevancy, or “fit” requires a “valid scientific connection” between the subject matter of the expert’s opinions and the factual issues to

be determined by the jury. *Jones v US*, 933 F Supp 894, 900 (ND Calif 1996). Here, Dr. Rottnek brings no expertise to the task at hand, whether the Defendants are deliberately indifferent to Plaintiffs' serious medical conditions. He functions merely as a conduit for other sources.

Dr. Rottnek relays guidelines by the CDC and allegations of inmates. He does not bring any of his purported expertise to bear on matter at issue in this case. It is improper to use an expert "as a conduit for hearsay testimony." *Hutchinson v Groskin*, 927 F2d 722, 725 (CA 2 1991). It is inappropriate for a witness to state the conclusions of one set of experts and testify that he merely agrees with them. *Thorndike v DaimlerChrysler Corp*, 266 FSupp2d 172, 185 (D Me 2003).

In his report, Dr. Rottnek merely concludes that the Jails should implement CDC guidelines. He is acting as a conduit for these guidelines. Of course, the trial court, the jury, and the parties can read the CDC guidelines for themselves. The imprimatur of an expert opinion giving unnecessary credibility and weight to these opinions is no warranted.

E. Dr. Rottnek's Report Exceeds the Scope of The Report Contained in The Order and Contains Personal Identifying Information.

Dr. Rottnek's Report exceeds the scope of the Order. It includes his recommendation to: "stop housing inmates in Division II as soon as possible." **Ex C**, ¶ 7(i). This recommendation is goes well beyond the risk of COVID-19 transmission and is based upon the "pervasive disrepair, irregular surfaces, rust, paint peeling..." etc. **Ex C**, ¶ 7(i). His report also considers the adequacy of medical care for diseases other than COVID-19. **Ex C**, ¶ 7(iv).

His report also includes personal identifying information that is private and protected by HIPAA. It lists names of inmates who are housed on the psychiatry floor and quarantine units. **Ex C**, ¶ 4.

Because Dr. Rottnek's report contains information and recommendations outside of COVID, these portions should be redacted, in addition to the names of inmates listed in his report.

WHEREFORE, Defendants respectfully request that this Honorable Court grant their motion and strike from the record Dr. Rottnek's report or, in the alternative, redact those portions of the report that provide opinions outside the scope of the Court's May 15, 2020 Order and that contain personal identifying information.

Respectfully submitted,

By: _____ s/ Sue Hammoud _____

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APPENDIX J

Plaintiffs' Opposition to Defendants'
Motion to Strike the Report of Fred Rottnek,
M.D., MAHCM

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

WAYNE COUNTY JAIL INMATES, et. al.,

Case No. 71 173 217 CZ

Plaintiffs,

Hon. Timothy M. Kenny

v.

WILLIAM LUCAS, et. al.,
Defendants.

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**PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO STRIKE THE REPORT
OF FRED ROTTNEK, M.D., MAHCM**

Plaintiffs and Defendants jointly proposed an order to this Court for an inspection of the Wayne County Jail and an accompanying report by Dr. Fred Rottnek to aid all parties in litigating the claims alleged in this suit.¹ The Joint Inspection Order set forth in detail the information Dr. Rottnek sought. There were no surprises. Defendants now seek to strike this Court-ordered report because they do not like what it says. Contrary to Defendants' claims, the report was prepared by a qualified expert, is sufficiently reliable, and contains factual information and recommendations relevant to the issues in this case. Defendants' Motion should be denied in its entirety.²

BACKGROUND

I. Procedural History

The jail inspection in this litigation is the product of hours of discussions between the parties and two orders from this Court. Defendants joined Plaintiffs in proposing the "Joint Proposed Inspection Order," and the Court subsequently entered this Order. In this Order, Defendants agreed that a jail inspection "shall take place," that "[t]he inspector shall be allowed to speak with and interview any person incarcerated at the Jail," and that "[t]he inspector shall provide a report to the parties and the Court" of the inspection. Ex. 2 at ¶¶ 1-4. Both parties were permitted to submit to the Court two candidates to serve as the inspector.³ Defendants declined to submit any candidates.

As entered by the Court, the Joint Inspection Order defines the parameters of the inspection and requires the inspector to prepare an accompanying report. *See* Ex. 2. Specifically, the Joint

¹ *See* Ex. 1, Joint Proposed Inspection Order ("Joint Inspection Order").

² Plaintiffs agree that any personal identifying information in the report should be redacted.

³ *See* Ex. 2, Stipulated Temporary Amendment to the Consent Order ("Stipulated Temporary Order"), at 3.

Inspection Order states that the inspection report “shall include any information [the inspector] was able to ascertain regarding the following:

- Conditions of the housing units during the COVID-19 pandemic;
- Conditions of and access to shower/bathroom facilities during the COVID-19 pandemic;
- Conditions of and access to medical, laundry, dining facilities and shared common areas during the COVID-19 pandemic;
- Availability and stock of cleaning supplies and personal protective equipment for inmates and Jail staff;
- Availability and stock of hygienic and disinfecting supplies for inmates and Jail staff;
- Availability of communications to inmates about COVID-19 including low-literacy and non-English-speaking people; and
- Social distancing measures.”

Id. at 3. The Joint Inspection Order did not prohibit either party from communicating with or sending relevant materials to the inspector in advance of the inspection or afterwards. At Defendants’ request, the Joint Inspection Order also required that the inspector would be made available for a deposition within 48 hours of submitting the inspection report. *Id.* at 2. Through the Joint Inspection Order, this Court selected and ordered Fred Rottnek, M.D., MAHCM to perform the inspection. *Id.* at 2.⁴

⁴ Defendants inappropriately mischaracterize Dr. Rottnek as “Plaintiffs’ expert.” Defs. Mot. at 1. Plaintiffs did not retain Dr. Rottnek as a witness for this lawsuit. Plaintiffs’ counsel do not represent Dr. Rottnek in any capacity. Under the Joint Inspection Order, both parties had the opportunity to depose Dr. Rottnek, which would be highly unusual if Dr. Rottnek was in fact “Plaintiffs’ expert.” Ex. 1 at 2.

II. Dr. Rottnek's Qualifications

Dr. Rottnek is currently a professor of family and community medicine at the Saint Louis University School of Medicine.⁵ In addition to his work at the University, Dr. Rottnek currently serves on the staff of Saint Louis University Hospital, and he is board-certified in family medicine and addiction medicine.⁶ Beginning next month, Dr. Rottnek will be the Medical Director of Family Courts and Juvenile Detention for the 22nd Judicial Court of St. Louis. *Id.* ¶ 2.

Before he began his professorship at Saint Louis University, Dr. Rottnek was the Medical Director and Lead Physician at the Saint Louis County Jail for fifteen years. *Id.* ¶ 3. He saw patients three days per week and was responsible for the health and general well-being of detainees and jail staff. *Id.* The jail's daily census ranged from 900 to 1,400 individuals, and throughout the year, he also directed the intake screenings of 30,000 to 34,000 newly arrested individuals. *Id.* ¶ 4. In this role, he was instrumental in the development of the jail's policies, operating procedures, and infirmary, hygiene, and cleaning protocols in response to the outbreak of Methicillin-Resistant Staphylococcus Aureus ("MRSA"). *Id.* ¶ 5. Because of his leadership, MRSA infections at the jail decreased to a one-eighth of the rate of infection at its peak. *Id.*

In addition to his time spent working at the jail, Dr. Rottnek has years of other experience in the field of correctional medicine and healthcare otherwise related to the criminal justice system. Dr. Rottnek is a certified Correctional Health Care Physician through the National Commission on Correctional Health Care. *Id.* ¶ 1. In response to the ongoing COVID-19 pandemic, he has worked with Saint Louis courts to safely reopen and has given presentations on how to mitigate risk in

⁵ Ex. 3, Affidavit of Fred Rottnek, M.D., ¶ 1.

⁶ Ex. 4, Curriculum Vitae of Fred Rottnek, M.D., at 1.

direct patient care. *Id.* ¶ 7. He has twice conducted court-ordered inspections at correctional facilities and has been previously qualified to testify as a corrections healthcare expert. *Id.* ¶ 7-8.

He is a member of the Society of Correctional Physicians and has recently been a member of the Academy of Correctional Health Professionals. *See* Ex. 4, at 3.

He has served on the Board of Advisors of the Criminal Justice Ministry of the Society of Saint Vincent de Paul and has taught courses, given lectures, and made presentations on correctional healthcare. *Id.* at 5-6, 13-16.

He also spent over a decade testifying on behalf of a county prosecutor and other county counsel. *Id.* at 6. He has published numerous articles on correctional medicine. *Id.* at 9-10.

III. The Inspection of the Wayne County Jail

Pursuant to this Court’s order, Dr. Rottnek inspected the Jail on May 16, 2020. He was accompanied by counsel for Plaintiffs and Defendants for the duration of the inspection. At this Court’s direction, on May 17, 2020, Plaintiffs emailed Defendants a proposed memorandum to send to Dr. Rottnek that included the format of the report, as required by the Inspection Order, as well as suggested topics for inclusion.⁷ Plaintiffs asked Defendants if they had anything they would like to modify or add to the memorandum. Defendants did not respond. Plaintiffs accordingly emailed Dr. Rottnek the memorandum in its original form on May 18, 2020, indicating that counsel for Defendants was copied and “may have additional thoughts.”⁸ In response, Dr. Rottnek, in pertinent part, wrote:

Sue and Paul,

Please let me know if there is something different you’d like on the format.

⁷ Ex. 5, Email from plaintiffs’ counsel to defense counsel, 5/17/20

⁸ Ex. 6, Email from plaintiffs’ counsel to Dr. Rottnek, 5/18/20

I plan to get back to this later this afternoon.

See Ex. 6.

Again, Defendants did not respond. Dr. Rottnek subsequently sent his report to both parties on May 19, 2020, three days after conducting his inspection. Defendants never sought to depose or otherwise challenge Dr. Rottnek's report despite the Joint Inspection Order permitting both Defendants and Plaintiffs to do so.

STANDARD OF REVIEW

Michigan Rule of Evidence 702 provides that if “the court determines that scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue,” a witness who is “qualified as an expert by knowledge, skill, experience, training, or education may testify thereto in the form of an opinion or otherwise.” MRE 702. This language “incorporate[s] *Daubert*'s standards of reliability.” *Gilbert v. DaimlerChrysler Corp.*, 470 Mich. 749, 781 (2004) (citing *Daubert v. Merrell Dow Pharms., Inc.*, 509 U.S. 579 (1993)). Under *Daubert*, courts must admit expert testimony if it is both reliable and relevant to the issues in the litigation. *See Daubert*, 509 U.S. at 589. Rejection of expert testimony is “the exception, rather than the rule.” *United States ex rel. TVA v. 1.72 Acres of Land*, 821 F.3d 742, 749 (6th Cir. 2016).

In Michigan, all relevant evidence is generally admissible. MRE 402. Evidence is relevant if it is material and has probative value. *See People v. Crawford*, 458 Mich. 376, 388 (1998). Evidence is material if it is related to “any fact that is of consequence to the action,” and it is probative when it tends to make the existence of any such fact “more probable or less probable than it would be without the evidence.” *Id.* at 388-390). This “threshold is minimal.” *Id.* at 390

ARGUMENT

I. Dr. Rottnek is qualified to offer testimony on the issue of medical care at the Jail.

The Michigan Rules of Evidence allow witnesses to provide expert testimony if they are qualified “by knowledge, skill, experience, training, or education.” MRE 702; *see also People v. Beckley*, 434 Mich. 691, 711 (1990) (“A witness is qualified as an expert by virtue of knowledge, skill, experience, training, or education in a pertinent field.”). An expert need not have a specialty in the exact topic of the litigation to provide expert opinion in the case. *See People v. Yost*, 278 Mich. App. 341, 394 (2008) (finding plaintiff’s expert qualified to offer an opinion about whether seven-year-old children are sufficiently mature to commit suicide because of his experience as a medical examiner who had performed thousands of autopsies). Michigan courts have recognized that any shortcomings in an expert’s experience go to the weight, not admissibility, of his testimony. *Id.* (citing *Gilbert*, 470 Mich. at 788-89).

In their Motion, Defendants do not challenge Dr. Rottnek’s education and qualifications as a medical doctor. Instead, they challenge his ability to opine on infectious disease and on COVID-19, how it spreads, and the science of combatting it. Defs. Mot. at 8-9. They argue that Dr. Rottnek is a medical doctor with a specialty only in family medicine and addiction medicine, *Id.* at 9. But Defendants’ argument wholly ignores Dr. Rottnek’s two decades of experience in correctional healthcare and asks this Court to do the same. Dr. Rottnek has substantial experience in correctional healthcare which qualifies to him provide expert testimony on healthcare at the Jail.

In the case at bar, Plaintiffs allege that Defendants response to COVID-19 at the Wayne County Jail does not meet the minimum standards required by the Eighth and Fourteenth Amendments. In other words, this lawsuit is about the quality of healthcare being provided at a correctional facility— here, the Jail—in the context of Defendants’ response to the COVID-19

pandemic. Dr. Rottnek's experience in correctional healthcare plainly qualifies him to give expert testimony in this case regarding the measures being taken at the Jail to prevent the spread of the novel coronavirus. His years of professional and teaching experience involving the issue of healthcare at correctional facilities qualify him to give expert testimony on this topic. *Cf. Mulholland v. DEC Int'l Corp.*, 432 Mich. 395, 408-09 (1989) (holding that witness experienced in milk manufacturing was qualified to give expert opinion on whether a machine defect caused disease in plaintiffs' herd of cows even though he was not an expert in animal disease).

For fifteen years, Dr. Rottnek served as the Medical Director and Lead Physician at the Saint Louis County Jail. *See* Ex. 4, at 1. In his role as Medical Director, he assisted in developing policies, procedures, and protocols to address the spread of to contain and mitigate the initial outbreak of MRSA (methicillin-resistant staphylococcus aureus) in the facility in the early 2000's. Like COVID-19, MRSA is an extremely contagious infectious disease that can live on surfaces for days and go undetected in its hosts. Ex. 1 ¶ 5; *see also Stoudemire v. Michigan Dep't of Corrections*, 22 F. Supp. 3d 715, 721 (E.D. Mich. 2014) (denying jail's motion for summary judgment of plaintiff detainee's Eighth Amendment claims rooted in her exposure to MRSA) ("It is well understood that MRSA presents serious risks to the carrier and can be a source of community acquired infections."). In order to successfully contain the outbreak, he helped develop an educational video shown daily to all the housing pods explaining transmission, prevention, and proper hand-washing to mitigate spread of the bacteria. *Id.* He assisted with creating protocols for institutional cleaning, including cleaning schedules and instructions for detainees to effectively sanitize their own cells with disinfecting wipes and workers to mop floors and properly sanitize high-touch surfaces and shared spaces. *Id.* And he helped develop medical protocols to

standardized antibiotic prescribing based on Bureau of Prisons recommendations. *Id.* Under his leadership, MRSA infections decreased to one-eighth of the rate of infection at its peak. *Id.*

Presently, Dr. Rottnek is working with the City of Saint Louis to safely reopen their courts. *Id.* ¶ 7. He has also been invited to give presentations on how to mitigate risk during the COVID-19 pandemic in direct patient care. *Id.* And he has previously conducted court-ordered inspections and given expert testimony on corrections healthcare. *Id.* ¶¶ 6-7.

During his career, Dr. Rottnek has received multiple Correctional Health Professional certifications and is a member of the Society of Correctional Physicians and has recently been a member of the Academy of Correctional Health Professionals. *Id.* at 2-3. For years, he lectured and presented on the topic of correctional healthcare, including the effects of a decreased jail population on the prevalence of infection. *Id.* at 5-6, 13-16. He has published numerous articles on correctional healthcare. *Id.* at 9-10. Importantly, he has even testified on many occasions *on behalf of* county prosecutors and other county counsel. *Id.* at 6.

Defendants rely on *Gilbert v. DaimlerChrysler Corp.*, 470 Mich. 749, 782 (2004), seemingly to argue that Dr. Rottnek is an expert in opioid addiction but not the COVID-19 pandemic. *Gilbert* is inapposite.

In *Gilbert*, the plaintiff sought to offer expert medical testimony by a social worker. *See Gilbert*, 470 Mich. at 782. The court there held that a social worker was not qualified to give expert medical opinion on the physiological effects of sexual harassment because he had no training nor experience in medicine. *Id.* at 789-91. The social worker had demonstrated no ability to “meaningfully” interpret medical records. *Id.* at 790. The same is not true here. Once again, Defendants’ argument completely ignores the fact that Dr. Rottnek’s findings and recommendations are directly within his extensive experience in correctional healthcare.

For example, Dr. Rottnek recommends that Defendants [REDACTED] [REDACTED]” Report at 11. He also recommends that the Defendants continue to reduce the Jail population because “fewer people in a facility means best practices will be more possible, fewer community resources will be needed, and other inmates and correctional staff will be safer.” *Id.* at 10-11. Dr. Rottnek’s experience in treating an infectious disease outbreak in his capacity as the medical director of a jail uniquely qualifies him to opine on the Jail’s response to COVID-19 in this fashion. Indeed, *Daubert* was meant to “relax the admissibility requirements” for expert testimony, not increase them. *United States v. Jones*, 107 F.3d 1147, 1158 (6th Cir. 1997); *see also Nelson v. Am. Sterilizer Co.*, 223 Mich. App. 485, 492 (1997) (“As long as the basic methodology and principles employed by an expert to reach a conclusion are sound and create a trustworthy foundation for the conclusion reached, the expert testimony is admissible no matter how novel.”). In fact, the CDC Guidance encourages jail officials to contact “their state, local, territorial, and/or tribal public health department if they need assistance in applying these principles,” without limitation to “infectious disease” providers.⁹

Defendants had the opportunity to depose Dr. Rottnek and ask about his qualifications but declined. They had the opportunity to contact him directly but declined. And they will have the opportunity to cross-examine him about his qualifications. At that time, the Court can decide what weight to give his testimony, but the report should not be stricken. *See Grow v. W.A. Thomas Co.*, 236 Mich. App. 696, 714 (1999) (“qualifications are relevant to the weight, not the admissibility, of [expert’s] testimony.”).

⁹ Centers for Disease Control & Prevention, Interim Guidance on Management of Coronavirus Disease 2019 (COVID19) in Correctional and Detention Facilities, (Mar. 23, 2020), <https://www.cdc.gov/coronavirus/2019-ncov/community/correction-detention/guidancecorrectional-detention.html>.

II. Dr. Rottnek's expert testimony is reliable because he reviewed relevant materials and facts made available to him.

Under Michigan rules, a qualified expert's testimony is admissible if "(1) the testimony is based on sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3) the witness has applied the principles and methods reliably to the facts of the case." MRE 702. MRE 702 incorporates the standards of reliability set forth by the Supreme Court in *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993).¹⁰ See *Gilbert*, 470 Mich. at 782. A "trial judge must have considerable leeway in deciding in a particular case how to go about determining whether particular expert testimony is reliable." *Kumho Tire Co. v. Carmichael*, 526 U.S. 137, 152 (1999). Expert testimony may be reliable if the expert reaches his conclusion by applying his experience in the relevant field. See, e.g. *Ruiz v. Johnson*, 37 F. Supp. 2d 855, 890-91 (S.D. Tex. 1999), *rev'd on other grounds*, 243 F.3d 941 (5th Cir. 2001) ("Expert Allen Breed's decades of experience evaluating prisons all across the country, for example, cannot be disregarded based on quibbles over his methodology. In evaluating the conditions of a prison system, having extensive experience in and around the cellblocks of this country is a paramount qualification."). A court must admit an expert's testimony if the expert "sufficiently explained how his experience led to his opinions." *Lenawee Co. v. Wagley*, 301 Mich. App. 134, 163-64 (2013).

Dr. Rottnek's report contains relevant factual information, is reliable, and should remain a part of the record. In cases like the one currently before the Court which involve nonscientific expert testimony, courts are well within their discretion to find the testimony reliable based on the expert's "knowledge and experience." *Hangarter v. Provident Life & Acc. Ins. Co.*, 373 F.3d 998,

¹⁰ *Daubert* applies to the admissibility of expert scientific testimony. See 509 U.S. at 590 n.8. Because this case does not involve scientific methodology, Defendants reliance on MCL 600.2955 is inapposite. MCL 690.2955 reflect the Michigan legislature's codification of the *Daubert's* scientific factors, which are not persuasive here.

1018 (9th Cir. 2004); *see also United States v. Hankey*, 203 F.3d 1160, 1169 (9th Cir. 2000) (“the witness had devoted years working with gangs, knew their ‘colors,’ signs, and activities. He heard the admissions of the specific gang members involved. . . . 702 works well for this type of data gathered from years of experience and special knowledge.”); *United States v. Jones*, 107 F.3d 1147, 1160 (6th Cir. 1997) (finding that handwriting analysis expert’s testimony was reliable because of his substantial experience examining and comparing handwriting samples); *Buechel v. United States*, No. 08-CV-132-JPG, 2012 WL 3154962, at *3 (S.D. Ill. Aug. 2, 2012) (“[H]e has the experience and training in correctional medicine and infectious diseases. As a result, the Court finds that the reasoning and methodology Dr. Greifinger used to develop his opinion is reliable.”); *People v. Dado*, No. 266962, 2007 WL 778489, at *3 (Mich. App. 2007) (“Green’s experience in investigating drug trafficking operations in Genesee County was sufficient to establish the reliability requirement. As an experienced police officer, he was capable of giving reliable testimony on how to recognize evidence of drug sales.”). Here, Dr. Rottnek has years of experience, training, and special knowledge in correctional medicine on which to base his recommendations.

Defendants unpersuasively argue that Dr. Rottnek’s report is unreliable because he, in part, relied on statements by interviewees, and the CDC’s Guidance for Correctional and Detention Facilities during the COVID-19 pandemic. They also challenge his failure to review Jail policies.¹¹ These arguments are without merit.

¹¹ For instance, Defendants state that the Jail uses “Simple Green d Pro 3 Plus” cleaning solution. Defs. Mot. at 10. But there are no facts nor other evidence in the record stating that Defendants provide this solution at the Jail. In fact, the only evidence currently in the record – plaintiffs’ declarations and Dr. Rottnek’s report – establish that Defendants provide basic Simple Green solution. [REDACTED]

[REDACTED] Report at 4, 7, 14. As of the time of this filing, Defendants have not provided evidence to the contrary. The only mention of Simple Green d Pro 3 Plus in this lawsuit is in Defendants’

First, it is uncontroverted that experts can offer expert testimony without ever having firsthand knowledge or personal observations of the subject at issue. *See Ogden v. Saint Mary's Med. Ctr.*, No. 06-11721-BC, 2007 WL 2746626, at *13 (E.D. Mich. Sept. 19, 2007) (citing *Daubert*, 509 U.S. at 589) (“the knowledge and experience of a particular discipline, provides the basis for relaxing the usual requirement of firsthand knowledge and permitting experts to opine with wider latitude.”). Dr. Rottnek could have merely read the declarations that are on the record and reliably offered his opinion. But, pursuant to the Joint Inspection Order, this Court ordered Dr. Rottnek to inspect the Jail and submit a report. His opinion is based on his firsthand observations—a step beyond the reliability requirements of MRE 702—interviews with approximately *forty* detainees, and prevailing authority on best practices for mitigating the spread of COVID-19. Once again, Defendants will have ample opportunity to cross examine Dr. Rottnek, and they can subpoena each of the individuals Dr. Rottnek interviewed.¹² *See Ellis v. Grand Trunk W. Ry. Co.*, 109 Mich. App. 394, 399 (1981) (finding that admission of inspection report allows the individuals, who made statements, to be subject to cross examination).

Second, Dr. Rottnek’s reliance on the CDC Guidance does not render his report unreliable. This Guidance reflects our federal government’s leading disease control agency’s recommendations on how to limit the spread of coronavirus in a carceral setting. This is exactly

Motion to Strike. Defendants have even failed to attach the relevant policies as exhibits to the Motion. The Court cannot consider this unsubstantiated claim when determining the reliability of Dr. Rottnek’s Report.

¹² Defendants’ argument that Dr. Rottnek “relied exclusively on his observations and the allegations relayed to him by inmates” are inaccurate and misleading. Defs. Mot. at 9. Dr. Rottnek’s report expressly states that he interviewed various members of the Plaintiff Class, staff in the Sheriff’s office, and medical staff at the Jail. Report at 2, 3. Defendants cannot mischaracterize undisputed facts merely because they disagree with the Report’s opinions and findings.

the type of information an expert witness should consider in the context of constitutional litigation related to prison conditions for COVID-19. *See, e.g., Brown v. Plata*, 563 U.S. 493, 549 (2011) (“courts are not required to disregard expert opinion solely because it adopts or accords with professional standards. Professional standards may be helpful and relevant with respect to some questions.”). As to the Defendants’ directives at the Jail, the purpose of the inspection was to see exactly what was happening in *practice* at the facilities. In any event, Defendants have had every opportunity to provide Dr. Rottnek with their directives, and any other information, before he drafted or finalized his report. Indeed, he invited their input. *See Ex. 6*. Defendants also had an opportunity to provide him with that information at a deposition. Defendants chose to do neither. For three weeks, Defendants have sat on their hands and now seek to rely on the gap in the record for which they are in fact responsible. Regardless, Dr. Rottnek can be cross-examined on this topic, which goes to the weight, not the admissibility, of his recommendations. *People v. Traxler*, No. 314951, 2014 WL 2934293, at *2 (Mich. Ct. App. June 26, 2014).

The Defendants next rely on a Ninth Circuit case for the proposition that experts must “adequately account for obvious alternative explanations.” Defs. Mot. at 10 (citing *Claar v. Burlington N. R. Co.*, 29 F.3d 499, 502 (9th Cir. 1994)). That duty, however, does not exist in the Ninth Circuit nor in Michigan.¹³ *See Atencio v. Arpaio*, No. CV-12-02376-PHX-PGR, 2015 WL

¹³ Regardless, *Claar* is wholly distinguishable from the facts before the Court in this case. It involved the reliability of scientific expert testimony, but here, Dr. Rottnek’s expertise is based on his experience and specialized knowledge in correctional medicine. *See Claar*, 29 F.3d at 502. In *Claar*, the experts failed to “rule out other possible causes for the injuries plaintiffs complain of, even though they admitted that this step would be standard procedure before arriving at a diagnosis.” *Id.* Defendants have not provided any authority which suggests that it is generally accepted in the field of correctional medicine to compare a jail’s policies to the firsthand accounts of detainees, staff, and the expert himself. Even assuming *arguendo* that the Jail’s policies are in accordance with the CDC Guidance and the outer bounds of the Constitution, this would have no bearing on Dr. Rottnek’s opinion on whether Defendants’ unconstitutional actions were in accordance with their own policies. *See Morgan v. Bd. of Cty. Commissioners of Oklahoma Cty.*,

11117187, at *17 (D. Ariz. Jan. 15, 2015) (“There is not, however, any requirement that an expert qualified based on his background and experience rely on literature or conduct independent research to support his opinions.”); *Mulholland v. DEC Int’l Corp.*, 432 Mich. 395, 414 (1989) (“to require for each expert an evidentiary basis sufficient to negate all of the possible causes which might be asserted by opposing counsel would virtually eliminate expert testimony.”).

Dr. Rottnek’s experience in correctional medicine and specialized knowledge in this field make his methodology here sufficiently reliable for admission. The Report should not be stricken.

III. Dr. Rottnek’s opinions and findings on the current conditions at the Jail are relevant to the constitutional violations Plaintiffs have alleged.

Expert testimony is admissible in Michigan if it “assist[s] the trier of fact to understand the evidence or to determine a fact in issue,” MRE 702, and is otherwise legally relevant. *People v. Peterson*, 450 Mich. 349, 363 (1995). Evidence is relevant if it has “any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable.” MRE 401. An expert’s testimony is relevant if it helps resolve an issue in the case. *Mulholland*, 432 Mich. at 344 n.3.

The United States Supreme Court has made clear that expert testimony regarding prison conditions is relevant when plaintiffs allege constitutional violations related to prison conditions. In *Brown v. Plata*, 563 U.S. 493, 522 (2011), the Supreme Court affirmed a three-judge panel’s reliance on expert testimony in a case alleging Eighth Amendment violations caused by prison overcrowding in California, where the panel had “relied extensively on the expert witness reports” that “based their conclusions on recent observations of prison conditions.” 563 U.S. at 522. Courts

No. CIV-08-1317-R, 2010 WL 11508854, at *9 (W.D. Okla. Mar. 11, 2010) (“A reasonable jury could also find from the evidence concerning conditions at the jail that the need for enforcement of existing policies . . . was so obvious and so likely to result in the violation of detainees’ Fourteenth Amendment rights”) (emphasis added).

across the country have widely affirmed this basic understanding. *See, e.g., Walker v. Schult*, 365 F. Supp. 3d 266, 288 (N.D.N.Y. 2019) (admitting expert testimony in case alleging Eighth Amendment violations from a licensed medical doctor who had served as clinical director of mental health system for Massachusetts’s prison system); *Braggs v. Dunn*, 317 F.R.D. 634, 651 (M.D. Ala. 2016) (admitting expert testimony of plaintiffs’ correctional mental health expert in an action brought by disabled prisoners alleging Eighth and Fourteenth Amendment violations where expert served as chief psychiatrist of state department of rehabilitation and correction); *Hadix v. Johnson*, No. 4:92-CV-110, 2005 WL 2243091, at *6 (W.D. Mich. Sept. 14, 2005) (finding credible expert testimony of family medicine board-certified doctor who had previously worked as the chief medical officer of a correctional facility in prisoner suit alleging Eighth Amendment violations); *see also Cameron v. Bouchard*, -- F. Supp. 3d --, 2020 WL 2569868 at *2, *10, *11, *22 (E.D. Mich. May 21, 2020) (relying on inspection of jail by medical expert to grant plaintiffs’ motion for preliminary injunction seeking immediate relief in suit alleging Eighth and Fourteenth Amendment violations during COVID-19 pandemic in Oakland County Jail).

Here, Plaintiffs have alleged violations of the Eighth and Fourteenth Amendments, rooted in Defendants’ failure to maintain sufficiently safe conditions at the Jail during the COVID-19 pandemic. Dr. Rottnek, a licensed medical doctor with significant experience managing healthcare in correctional facilities—including an outbreak of a very contagious infectious disease—has based his conclusions on his personal observations of current conditions at the Jail: detainees’ inability to socially distance and the inability to properly clean facilities to prevent infection. His report is therefore relevant to this Court’s ultimate determination of whether emergency measures are needed to ameliorate those conditions and prevent any further spread of COVID-19.

Defendants argue that, because Dr. Rottnek has recommended that the Jail comply with the CDC's Guidance for Correctional and Detention Facilities during the COVID-19 pandemic, he is impermissibly offering the testimony of another set of experts and is thus operating as a "conduit for hearsay testimony." Defs. Mot. at 11. Once again, Defendants are incorrect.



In his 23-page report, Dr. Rottnek includes, where appropriate, a handful of citations or references to the COVID-19 guidelines promulgated by CDC—the federal government's leading national public health institute. Dr. Rottnek does not adopt the CDC Guidance as his own or otherwise offer it to prove the truth of the information therein.¹⁴ *See* MRE 801(c). Regardless, a publication from the CDC, a federal agency housed under the Department of Health and Human Services, falls under the catch-all hearsay exception of MRE 803(24) because it is an "official (formal) statement by [a] government agenc[y]." *Kagen v. Kagen*, 2014 WL 7217819 at *5 (Mich. App. 2014). Finally, even if the inclusion of hyperlinks to the CDC Guidance *did* constitute hearsay—which it plainly does not—Dr. Rottnek, as an expert witness, is permitted to "testify to an opinion based on hearsay information." *Swanek v. Hutzal Hosp.*, 115 Mich. App. 254, 260 (1982) (citing *Dayhuff v. General Motors Corp.*, 103 Mich. App. 177, 184-85 (1981); *see also Tiffany v. The Christman Co.*, 93 Mich. App. 267, 279-80 (1979). In fact, hearsay statements may support an expert's opinion, without forming the basis of that opinion. *See People v. Bynum*, No. 307028, 2013 WL 1689660, at *17 (Mich. App. 2013), *aff'd*, 496 Mich. 610 (2014) (finding

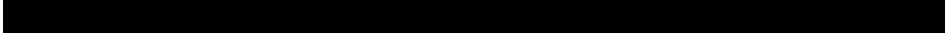

¹⁴ The cases cited by Defendants are plainly inapposite. *See Hutchinson v. Groskin*, 927 F.2d 722, 725 (2d Cir. 1991) (expert witness read aloud documents prepared by three other physicians "who were not disclosed as experts during discovery and whom plaintiff had no opportunity to examine"); *see Thorndike v. DaimlerChrysler Corp.*, 266 F. Supp. 2d 172, 185 (D. Me. 2003) (finding that opinions of expert witness were "unnecessarily duplicative" if other experts already admitted in the case). Defendants will have an opportunity to cross examine Dr. Rottnek, and there currently are no other experts admitted to testify in this litigation.

that an expert’s opinion “would be supported by statements in police reports and people in the neighborhood, not that these statements formed the basis for his opinion.”).

Dr. Rottnek’s report contains opinions, findings, and recommendations that are relevant to the constitutional issues that Plaintiffs have raised in this lawsuit. The report should not be stricken.

IV. Dr. Rottnek’s report does not exceed the scope of the Inspection Order.

In a last-ditch effort to strike Dr. Rottnek’s report, Defendants argue that Dr. Rottnek’s recommendation that Defendants “stop housing inmates in Division II” exceeds the bounds of the Inspection Order. This argument, too, must fail. The Inspection Order states that the Report should include information about the “conditions of the housing units during COVID-19.” Ex. 2 at 3 (emphasis added). The Report recommends that Defendants “ ” because:




Report at 12 (emphasis added). Put simply, after conducting a seven-hour inspection of the Jail, Dr. Rottnek opined about the conditions of the Division II housing units. Nothing more, nothing less. There is, thus, no basis for redacting the Report.¹⁵

¹⁵ Plaintiffs are willing to file a motion to redact the names of detainees on the psychiatric floor and in the quarantine units.

V. **Dr. Rottnek's report contains relevant facts independent of his qualification as an expert.**

Regardless of whether Dr. Rottnek is qualified as an expert in this action, his report contains relevant facts from the inspection of the Jail as ordered by this Court that warrant admission. Plaintiffs have alleged that they do not have sufficient access to adequate sinks, showers, toilets, clean laundry, medical care, cleaning supplies, or PPE. They have alleged that Jail staff do not properly clean Jail facilities or wear PPE themselves. And they have alleged that their current conditions of confinement do not permit them to engaging in social distancing—the single-most important precaution anyone can take to prevent the spread of COVID-19. Separate from any expert opinions or recommendations, Dr. Rottnek memorialized in his report his first-hand observations, including but not limited to: to the design and cleanliness of the Jail; the number and quality of sinks, toilets, and showers; the provision of medical, laundry, and dining services; and whether he witnessed Jail staff and detainees wearing personal protective equipment (PPE) and practicing social distancing. As a result, Dr. Rottnek is as much a fact witness as an expert, and his observations are both material and have probative value and should be admitted. *See* MRE 401-02; *Crawford*, 458 Mich. at 388.

CONCLUSION

Dr. Rottnek's report contains relevant factual information and recommendations that bear directly on the issues in this case. He is immensely qualified to provide expert opinion on correctional healthcare. He used reliable methodology for his findings and recommendations. The Defendants had the opportunity to cross-examine him in deposition (but declined) and will again at the upcoming hearing. There is no compelling reason for the Court to strike Dr. Rottnek's report. Defendants' Motion should be denied.

Dated: June 8, 2020

Respectfully submitted,

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Attorneys for Plaintiffs

**Pro hac vice admission pending*

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed with the Clerk of Court using this Court's electronic filing system.

/s/ Allison L. Kriger _____

APPENDIX K

Affidavit of Bridgette Jones, RN MS ICP DIS
SANE CPI

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

WAYNE COUNTY JAIL INMATES, *et al.*

Plaintiffs,

Case No. 71-173217-CZ

v.

Hon. Timothy M. Kenny

WILLIAM LUCAS, *et al.*

Defendants.

AFFIDAVIT OF BRIDGETTE JONES, RN MS ICP DIS SANE CPI

STATE OF ILLINOIS)
)
COUNTY OF COOK)

Affiant being duly sworn states as follows:

1. My name is Bridgette Jones RN MS, and I am over the age of eighteen (18) years.
2. I am a Nurse Epidemiologist with approximately twenty years of experience in clinical, academic, and administrative medicine.
3. Over the past 9 years, I have devoted my career to correctional medicine at a large-scale urban adult and juvenile detention facility. I currently work as the Nursing Education, Infection Prevention, Quality & Correctional Program Director for Cermak Health Services of Cook County, Chicago, Illinois.
4. Over three years ago, I was appointed and presently serve as the State of Illinois delegate for the National Institute of Corrections (NIC) Infection Prevention Managerial Network. This committee serves as an advisory board for correctional infection prevention and control for all U.S. correctional facilities including prisons, detention facilities, and immigration and custody

enforcement (ICE). More importantly, on behalf of this network, I participated on an ad-hoc committee that collaborated with the Centers for Disease Control & Prevention (CDC) in the formation of the CDC: Interim Guidance on Management of Coronavirus Disease 2019 (COVid-19) in Correctional and Detention Facilities.

5. I have been retained by the Defendants as an expert witness in the case of *Russell vs. Wayne County Jail*.

6. My Curriculum Vitae is attached.

7. Given my years of training and experience, I believe that I am duly qualified to serve as an expert witness for the Defendants in this case.

8. I have reviewed the following documents prior to writing this report, which were supplied to me by defense counsel:

- a. Plaintiff complaint filed in the Eastern District of Michigan;
- b. Dr. Rottnek's report;
- c. Declaration of Dr. Luring;
- d. Declaration of Dr. Meyers;
- e. Policies/Directives/Orders put into place at the Wayne County Jail in response to COVID-19;
- f. CDC guidelines for correctional institutions;
- g. Plaintiff declarations;
- h. Testing results of Wayne County Jail population as of May 9, 2020;
- i. Affidavit of Mark Morrissey;

9. From my review, it is clear that Wayne County Jail began issuing policies and directives to address the pandemic, well before the publishing of the CDC Covid-19

correctional guidelines. Below are the various **policies and directives** implemented by the WCJ in response to the COVID-19 pandemic which I reviewed:

- a. Directive COJAC 20-04 signed **March 13, 2020**, which outlines officer guidelines per CDC guidance for identification and handling of COVID-19. The directive includes measures regarding transportation of inmates, isolation of new inmates, social distancing, and infection prevention.
- b. Directive COJAC 20-05 signed **March 20, 2020**, which requires all persons entering the building to undergo a temperature screening and health assessment. The screening and assessment process consisted of forehead temperature scans along with visual observation and a brief questionnaire. Any person coughing, sneezing, experiencing shortness of breath, or other obvious signs of illness shall also be denied entry.
- c. Directive COJAC 20-06 signed **March 21, 2020**, revised the prior directive requiring temperature screening and health screenings to coincide with the CDC recommendations.
- d. A directive from **March 24, 2020**, announcing biweekly distribution of N95 masks to all members of the staff.
- e. Directive COJAC 20-07, signed on **March 27, 2020**, which set a policy that all new book inmates entering the jail facilities will be screened and assessed for signs and symptoms of COVID-19 and will be quarantined for a minimum of 72 hours.

- f. Directive COJAC 20-08, signed on **March 31, 2020**, which required PPE for officers assigned hospital detail security. The directive also included a diagram of the proper method for donning and doffing of respirators.
- g. Directive COJAC 20-09, signed on **April 1, 2020**, which outlined risk reduction protocols and procedures to eliminate the exposure and spread of COVID-19. The policy outlined; screening, visits, inmate transports, quarantine, personal protective equipment (PPE), cleaning and sanitation, hand hygiene, laundry, signage educating on the importance of social distancing, handwashing, and personal hygiene.
- h. Reusable face shields were issued to officers on **April 1, 2020**.
- i. Directive COJAC 20-03, dated **April 10, 2020**, which required inmates to wear surgical masks when they are outside their cells. The policy states that inmates are to be issued a new surgical mask every two weeks.
- j. An inmate and officer signature sheet for picking up face masks, dated **April 10, 2020**.
- k. A directive from **April 12, 2020**, which stated that all inmate activity was to be restricted to the assigned housing unit. Furthermore, inmates are not allowed off their unit for any non-critical function.
- l. General Memo U/S 20-07, stating that it was WSCO duty to get tested and report COVID-19 symptoms, dated **April 20, 2020**.
- m. General Order U/S 20-08, signed on April 23, 2020, which **required all personnel to wear masks**.
- n. **Administrative Releases**

10. In addition, Wellpath Defendants' contracted medical provider enacted several measures to address the pandemic:
 - a. The procedure for a suspected case of coronavirus was issued on **March 2, 2020**;
 - b. Isolation and Cohort Guidance for COVID protocols, in accordance with CDC guidelines, were issued on **March 17, 2020**;
 - c. A patient testing strategy was implemented and updated;
 - d. Off-site guidance during COVID-19 procedures were issued;
 - e. Guidance for CPR procedures during COVID were issued;
 - f. COVID-19 provider's orders and treatment plan were instituted;
11. From my review, it is clear that the Jail has been proactive in releasing the nonviolent inmates and those in for traffic violations along with the use of administrative releases.
12. Additionally, other measures taken have reduced the inmate population in the WCJ by over 40%. On **March 13, 2020**, the total inmate population of the Jail was 1,390 inmates. Currently, that population is around 800 inmates.
13. The entire inmate population was tested for Covid-19 on **May 9, 2020**.
14. Prior to enacting testing for the entire population, Wellpath conducted 124 COVID-19 tests on suspected inmates.
15. A total of 939 tests were conducted as of **May 9, 2020**. The results were that 85 inmates tested positive for COVID-19.
16. Since the pandemic started in early March, only two (2) inmates required a brief hospitalization, but zero (0) inmates have required an ICU admission, and there have been zero (0) inmate deaths.

17. Currently, it is my understanding that there are only 14 patients that remain COVID positive in the jail. The rest have been cleared as no longer being COVID positive.
18. Based on this statistic, it would appear that around 10% of the tested population at the Wayne County Jail was positive, yielding decreased positivity rates to that of the community and other comparable correctional facilities.
19. As of **June 8, 2020** pursuant to a Court Order, all new inmates entering the Wayne County Jail are to be tested for COVID-19. All inmates who test negative shall be re-tested in 14 days from their booking. The Order further indicates that all inmates who test negative for PCR, but positive for Serology at the time of booking, may be housed in general population.
20. In my review of the expert's opinion, it is clear that subject matter experts for the Plaintiff rely on certain parts of the CDC guidelines in formulating their opinions.
21. The CDC issued "Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correction and Detention Centers" on **March 23, 2020**. These guidelines were intended to assist facilities in preventing the spread of the virus from outside the facility to inside the facility. Also, the CDC clearly points out that the guidelines are intended to be used and adapted as suited to one's own setting.
22. In review of Dr. Rottnek's report, I disagree with the opinion that Div. II should be closed because of COVID-19. Dr. Rottnek's opinion that preventative measures cannot be enacted to prevent the spread of the virus is false. This is illustrated by the test results decreased positivity rates, and zero number of deaths, which Dr. Rottnek did not include in his report. Further, after testing, it is presumed that only negative people are being cohorted which greatly minimized the risk of transmission. I believe that the

opinion that preventative measures cannot be enacted, and that double bunking is reckless is false. Again, with the CoVid-19 testing and preventative measures that have been put into place, the risk of transmission was minimalized.

23. The idea that quarantining the prisoners is punishment is false. Quarantining is not only appropriately defined but recommended in the CDC guidelines as, it is the only way to protect the population from an outbreak.
24. Contrary to Dr. Luring, social distancing can be achieved in multiple ways pursuant to the CDC recommendations. One size does not fit all as indicated as a disclaimer in the beginning of the CDC CoVid-19 guidance. Each facility will need to choose what works for them. Other examples of social distancing are serving meals in cells, sleeping head to foot, and suspending group programs where people will be in closer contact than in their housing environment, all things which were enacted by the Jail pursuant to the directives and orders.
25. For the reasons above, it is my professional judgment that individuals placed in any division of the Jail are not at a significantly higher risk of infection for COVID-19 when compared to the population in the community.
26. The Jail's population has been reduced to the point where social distancing can be successfully achieved.
27. The medically vulnerable individuals with pre-existing conditions (e.g., heart disease, chronic lung disease, chronic liver disease, suppressed immune systems, cancer, diabetes, hypertension, respiratory conditions, or those who are over the age of 50; most of which have been released if the risk to the public is tolerable.

28. From my review, it is clear that Wayne County Jail and its stakeholders have adhered to CDC recommendations, and have enacted adequate pandemic plans to prevent the spread of CoVID-19 in the Jail.

Further affiant sayeth not.

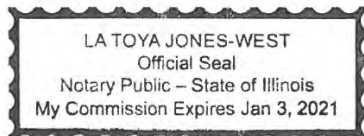
Bridgette Jones, RN MS ICP DIS SANE CPI

BRIDGETTE JONES, RN MS ICP DIS SANE CPI

Subscribed and sworn to before me
This 17th day of June 2020

Notary Public, State of Illinois
County of Cook
My Commission Expires: 1/3/21
Acting in the County of Cook

La Toya Jones-West



Document received by the MI Wayne 3rd Circuit Court.

BRIDGETTE JONES, RN BS MS DIS ICP SANE CPI

Professional Contact Information:

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Chicago, IL. 60643
(773) 674-4988 (Office)
(708) 271-2813 (Cellular)
bjones_ofh@yahoo.com

OBJECTIVE:

Seeking contractual employment with an institution that encourages professional growth and development while simultaneously utilizing my education, training, skillset, and diverse background to enrich, empower, and promote professional nursing, quality, and industry best practices within correctional populations both regional and aboard.

ACADEMIC BACKGROUND:

University of Illinois, Champaign – Urbana, Illinois

Institute of Healthcare & Not for Profit Management: Masters of Health Services Administration (MS)

Bachelor of Science Health Administration & Nursing Education (BS)

Centers for Disease Control & Prevention (CDC): Disease Intervention Specialist (DIS)

City Colleges of Chicago: College of Nursing Professional Registered Nurse (RN)

Association of Professionals in Infection Control (APIC): Epidemiology 101: Fundamentals of Infection Surveillance

Association of Professionals in Infection Control (APIC): Epidemiology for Long-Term Care & Congregate Settings

Eligible: Certified Infection Control & Prevention (CIC)

PROFESSIONAL EXPERIENCE:

Cook County Bureau of Health Services:

Nurse Epidemiologist: Nursing Education, Infection Prevention, Quality, & Correctional Program Director

Cermak Health Services of Cook County, Chicago, IL 2011 to Present Day

Oak Forest Hospital of Cook County, Oak Forest, IL 2003 – 2011

- Educated patients on health care management, trained staff on safety promotion, reduction of surgical site infections, reducing medication errors, and evaluation of health service requests and detainee grievances.
- Conduct active surveillance of community acquired and nosocomial multi-drug resistance organisms.
- Directed correctional healthcare for infection control for a population of over 10,000 detainees.
- Sole ICP for 200+ Acute inpatient, LTC, and Outpatient in JCAHO accredited facility.
- Reviewed and monitored implementation of infection control policies within hospital setting and bureau wide.
- Consults with infectious diseases to implement plan of control for all outbreaks and unusual occurrences.
- Monitored environmental and isolation compliance with regulatory and accreditation agencies; i.e. JCAHO.
- Identified and controlled the spread of infectious disease to ensure safety among patients, staff, and visitors.
- Educated employees on blood pathogens, isolation types, communicable disease, and hand hygiene.
- Collaborated with Quality and Nursing to ensure criteria from National Patient Safety Goals of hand hygiene, CAUTI, SSIs, CLABSIs are properly monitored and meeting expectations.
- Facilitated monthly infection control committee meeting with various where epidemiological trends, outbreaks and monthly environmental surveys were endorsed to various department leadership disciples.

BRIDGETTE JONES, RN BS MS DIS ICP SANE CPI

Page 2/4:

- Managed data on communicable and enteric diseases reportable to IDPH, City Health Dept, and affiliates
- Reinforced OSHA guidelines for employee safety in the reduction of needlesticks injuries, blood borne pathogens, and airborne contaminants.
- Participated in the JCAHO readiness team to proactively seek out potential citations and provide remedy thus, increasing likelihood of passing impending regulatory inspections.
- Trained staff and community at large on principles of disinfections and sterilization, the proper use of isolation precautions, personal protective equipment to prevent spread of communicable diseases, and the importance of suggested vaccinations.

National Institute of Health (NIH) & National Institute of Corrections: Washington, D.C.

Illinois Liaison for Correctional Nursing Education & Prevention Network 2016 – Current Day

-
- Provide intermittent contractual services for an inaugural advisory planning board on correctional nursing on safety, prevention and control, and quality to avail industry benchmarks in correctional health and nursing.
- Provide subject matter expertise in review of correctional health data and advisement for planning, training, and policy state-wide as needed.
- Act as a liaison and resource for rural and under supported correctional nursing programs and the development of orientation and pre-surveying models of preparedness.

Cook County Bureau of Health Services: Cook County Department of Public Health, Oak Park, IL

Communicable Disease Epidemiologist & Public Health Nursing, 1992 – 2003

- Facilitated well care visits and nursing care in both public, clinical, and ambulatory care settings for chronic diseases.
- Provided onsite monitoring and surveillance of local hospitals, nursing homes, LTC facilities, day care centers, restaurants, and recreational facilities alike.
- Conducted active surveillance for the control of communicable and enteric diseases as reportable to IDPH within various healthcare agencies of the vast jurisdiction of Cook County.
- Analyzed laboratory data and morbidity trends via surveillance to assist with community outbreaks, congenital mortality, and prevent endemic spread.
- Generated monthly statistical analysis of morbidity, partner/cluster contact indexes, and timely disease treatment per IDPH and CDC guidelines.
- Supervised/trained existing and new employees on protocols of field investigation, public health educating, treatment guidelines, case management, and counseling techniques.
- Collaborated with local hospital, correctional centers, private doctor offices, LTC/Psych facilities, and various school districts to assure prompt reporting and treatment of reportable disease criteria as identified by IDPH and CDC.

Community Colleges (City Colleges of Chicago)

Adjunct Instructor Health Services & Business Administration Programs 2007 – 2011

- Educated students preparing for careers in Nursing, Health care, Medical Assistants, & Business Admin.
- Served as adjunct professor for two practical nursing a basic nursing programs with an annual student enrollment of 1,500 nursing students and a personnel staff of 105 from an array of allied health disciplines.
- Prepared innovative instructional lesson plans to increase engagement and active classroom participation.
- Provided individual tutoring sessions, career advisement, internships, research, and editing projects/ papers.

Document received by the MI Wayne 3rd Circuit Court.

BRIDGETTE JONES, RN BS MS DIS ICP SANE CPI

Page 3/4:

Wellness Inc. /American Lung Association, Chicago, IL

Immunization Nurse Coordinator, 2002 – 2006

- Directed the execution of various corporate and municipal health screening by providing seasonal vaccinations, glucose screening, phlebotomy, body fat analysis, and osteoporosis screening.
- Ensured customer satisfaction by educating employees on their screening results, troubleshooting mechanical difficulties, and completing performance evaluation of staff.

Kraft/Nabisco Food Corporation, Chicago, IL

Occupational Health & Safety Nurse, 1999 – 2002

- Triageed occupational injuries within an on-site factory emergency room setting by providing first aid, physical therapies, medication dispensing, and executing appropriate follow-up discharge to private doctor's office and/or to local emergency room.
- Processed employee qualifying for worker's compensation, long/short term disability, FMLA, and occupational reclassifications.
- Collaborated with Human Resources to provide employee in-services on communicable disease reporting, OSHA hazardous materials and workplace safety trainings, substance abuse screenings, body mechanics, and audiology screening.

Planned Parenthood, Chicago, IL

Surgical Recovery Nurse Educator, 1997 – 1999

- Administered nursing care for post-operative patients in a recovery room setting by monitoring complications, surveillance of pathology labs, and initiating discharge planning procedures.
- Educated patients on family planning techniques, surgical site infections, medication side effects, and reporting of complications via 24 hours on-call service.

Evaluator/Publications:

- DOJ/NIC Committee Member in the development of CDC Guidance of CoVid-19 in Corrections/Detentions
- National Institute of Corrections (NIC) Infection Control Practitioner Orientation Modules 2018/2019
- Chief Nursing Examiner for U.S. Patent & Trademark Office 2016 Patent # 43221.00.0035
- Illinois HIV/AIDS Strategy: IDPH Office of Health Promotion 2012
- Accreditation Commission for Education in Nursing 2010

Professional Recognition & Honors:

- Safety Now: High Reliability Trainer of the Year Cook County Health 2018
- Clinical Nurse Excellence Award, Cook County Health & Hospital System 2016
- Nurse Educator of the Year, Cook County Health & Hospital May 2015
- Nurse Educator of the Year, City College of Chicago, December 2014
- Unsung Hero, Kennedy King College, May 2010
- Recipient IDPH Outstanding Disease Intervention Specialist 2008
- Trainer of the Year; Healthy People Cook County Public Health Dept 2005

BRIDGETTE JONES, RN BS MS DIS ICP SANE CPI

Page 4/4:

Recent Presentations/Webinars:

- US Dept of Justice (DOJ)/NIC Webinar: *"Practical Correctional Considerations in Covid-19"*
- Correctional Nursing & Prevention: *"The Good, The Bad, & the Ugly"*
- Infection Prevention in Funeral Service Personnel Webinars
- Special Considerations in the Management of Tuberculosis in Correctional Healthcare
- Safety Now: Promoting High Reliability in Healthcare
- Department of Justice (DOJ) & JCAHO Surveyor Readiness Teams
- Crisis Prevention Intervention & De-escalation
- What's New in Infection Prevention & Control

Special Training & Skills:

- Certified: High Reliability/Safety Now
- 3M Disinfection & Sterilization Techniques
- Certified: Sexual Assault Nurse Examiner (SANE)
- Certified: Crisis Prevention Intervention & De-escalation
- Certified: BLS (Basic Life Saving) CPR
- Certified: American Sign Language (ASL)
- Certified: State of Illinois Elementary Education Substitute Teacher
- Bard: PICC Line Insertion

Professional Memberships & Affiliations:

- National Institute of Corrections (NIC) Member; Nursing & Prevention
- American Nurse Association, Member
- Illinois Nursing Association, Member
- Crisis Intervention & De-Escalation
- Member, Association of Professionals in Infection Control (APIC)
- Member, University of Illinois Alumni Association
- Member, IDPH, PCPG, HIV, Prevention Planning Coalition
- Member, Chicago Nurses Association
- Member, Illinois Medical Emergency Response Team (IMERT)
- Member: Corporate Quality & Planning Team CCHHS

Professional References:

- Dr. Chad Zawitz, MD ID - Chair of Correctional Infectious Diseases
Cermak Health Services of Cook County
(312) 969 – 2727 (Cellular)
chad.zawitz@gmail.com
- Anita Grant, CAPT, USPHS - US Correctional Healthcare Manager
National Institute of Corrections (NIC)/Bureau of Prisons (BOP)
(202) 616-2800 (Office)
apollard@bop.gov
- Dr. Barbara O. Ragland, PHD
(773) 490 – 9668 (Cellular)



U.S. Department of Justice
National Institute of Corrections

Washington, DC 20534

March 24, 2020

MEMORANDUM

To: Cook County Health Cermak Health Services of

From: Robert Brown, Jr., Senior Deputy Director, National Institute of Corrections
Ronald F. Taylor, Chief, Prisons Division, National Institute of Corrections

Subject: Request for approval of webinar participant - Bridgette Jones

This memorandum is to request the participation of Ms. Bridgette Jones, Infection Control and Prevention Program Director - Cermak Health Service of Cook County Health, to present in a national webinar entitled "Practical Correctional Considerations in Response to COVID-19" being held the week of March 30, 2020. As you are aware, Ms. Jones has represented Cook County Jail on NIC's Infection Prevention & Control Manager Network since its inaugural meeting in July 2015. This webinar will also include representatives from the Indiana Department of Corrections, Virginia Department of Corrections and the Centers for Disease Control and Prevention.

CAPT Anita Grant, the coordinator for this webinar, can be reached at APollard@bop.gov or (202) 616-2800 should you have questions or concerns.

Continuing Education Certificate

AWARDED TO

Bridgette Jones

In Recognition of Completing



**The Fundamentals of Infection Surveillance,
Prevention and Control**

**Chicago, IL
September 19-20, 2016**

and is awarded 13.75 contact hours.



The Association for Professionals in Infection Control and Epidemiology, Inc. is accredited as a provider of continuing nursing education by the American Nurses Credentialing Center's Commission on Accreditation.

APIC is an approved provider of continuing education by the California Board of Registered Nursing, Provider Number CEP 7146.

This course provides for a maximum of **13.75** contact hours (60 min = 1 contact hour).

A handwritten signature in cursive script, appearing to read 'Carol McLay', is written over a horizontal line.

Carol McLay, DrPH, RN, CIC
Lead Nurse Planner
Certificate issued October 25, 2016

Association for Professionals in Infection Control and Epidemiology
1275 K Street NW • Suite 1000 • Washington, DC 20005 • Phone: 202-789-1890

APPENDIX L

Affidavit of Louis Shicker, M.D.

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE**

WAYNE COUNTY JAIL INMATES, *et al.*

Plaintiffs,

Case No. 71-173217-CZ

v.

Hon. Timothy M. Kenny

WILLIAM LUCAS, *et al.*

Defendants.

AFFIDAVIT OF LOUIS SHICKER, M.D.

STATE OF MINNESOTA)
)
COUNTY OF RAMSEY)

Affiant being duly sworn states as follows:

1. My name is Louis Shicker, M.D., and I am over the age of eighteen (18) years.
2. I am a board-certified internist with approximately thirty years of experience in clinical, academic, and administrative medicine.
3. I am a certified correctional health professional with additional certification in the physician subgroup section. I have also represented Illinois in the Coalition for Correctional Health Authorities of the American Correctional Association (“ACA”) and served as vice chair of the research committee for the ACA.
4. Over the past 18 years I have devoted my career to correctional medicine. This began as a part time physician at a correctional facility in Illinois, then as the medical director of that facility. I subsequently moved on to become the Medical Director for the Illinois Department of Corrections. I was in that position for 6 years.

5. I currently work as the Regional Medical Director for Centurion – a correctional medicine vendor – overseeing their Minnesota contract.

6. I have been retained by the Defendants as an expert witness in the case of *Russell vs. Wayne County Jail*.

7. My Curriculum Vitae is attached.

8. Given my years of training and experience, I believe that I am duly qualified to serve as an expert witness for the Defendants in this case.

9. I have reviewed the following documents prior to writing this report, which were supplied to me by defense counsel:

- a. Plaintiff complaint filed in the Eastern District of Michigan;
- b. Dr. Rottnek's report;
- c. Declaration of Dr. Luring;
- d. Declaration of Dr. Meyers;
- e. Policies/Directives/Orders put into place at the Wayne County Jail in response to COVID-19;
- f. CDC guidelines for correctional institutions;
- g. Plaintiff declarations;
- h. Testing results of Wayne County Jail population as of May 9, 2020;
- i. Affidavit of Mark Morrissey;

10. From my review it is clear that Wayne County Jail began issuing policies and directives to address the pandemic, some well before the publishing of the CDC guidelines. Below are the various **policies and directives** implemented by the WCJ and its medical provider Wellpath in response to the COVID-19 pandemic which I reviewed:

- g. Directive COJAC 20-09, signed on **April 1, 2020**, which outlined risk reduction protocols and procedures to eliminate the exposure and spread of COVID-19. The policy outlined; screening, visits, inmate transports, quarantine, protective equipment, cleaning and sanitation, hygiene, laundry, signage educating on the importance of social distancing, handwashing, and personal hygiene.
 - h. Reusable face shields given to officers on **April 1, 2020**.
 - i. Directive COJAC 20-03, dated **April 10, 2020**, which required inmates to wear surgical masks when they are outside their cells. The policy states that inmates are to be issued a new surgical mask every two weeks.
 - j. An inmate and officer signature sheet for picking up face masks, dated **April 10, 2020**.
 - k. A directive from **April 12, 2020**, which stated that all inmate activity was to be restricted to the assigned housing unit. Furthermore, inmates are not allowed off their unit for any non-critical function.
 - l. General Memo U/S 20-07, stating that it was WSCO duty to get tested and report COVID-19 symptoms, dated **April 20, 2020**.
 - m. General Order U/S 20-08, signed on April 23, 2020, which **required all personnel to wear masks**.
 - n. **Administrative Releases**
11. In addition, Wellpath Defendants' contracted medical provider enacted several measures to address the pandemic:
- a. The procedure for a suspected case of coronavirus was issued on **March 2, 2020**;

- b. Isolation and Cohort Guidance for COVID protocols were issued on **March 17, 2020**;
 - c. A patient testing strategy was implemented and updated;
 - d. Off-site guidance during COVID-19 procedures were issued;
 - e. Guidance for CPR procedures during COVID were issued;
 - f. COVID-19 provider's orders and treatment plan were instituted;
12. From my review its clear that the Jail has been proactive in releasing the nonviolent inmates and those in for traffic violations along with the use of administrative releases.
13. Additionally, other measures taken have reduced the inmate population in the WCJ by over 40%. On March 13, 2020, the total inmate population of the Jail was 1,390 inmates. Currently, that population is around 800 inmates.
14. The entire inmate population was tested on May 9, 2020.
15. Prior to enacting testing for the entire population, Wellpath conducted 124 COVID-19 tests on suspected inmates.
16. A total of 939 tests were conducted as of May 9, 2020. The results were that 85 inmates tested positive for COVID-19.
17. Since the pandemic started in early March, only two (2) inmates required a brief hospitalization, zero (0) inmates have required an ICU admission and there have been zero (0) inmate deaths.
18. Currently, its my understanding that there are only 14 patients that remain COVID positive in the jail. The rest have been cleared as no longer being COVID positive.
19. Based on this statistic, it would appear that around 10% of the tested population at the Wayne County Jail was positive.

20. As of June 8th, pursuant to a Court Order, all new inmates entering the Wayne County Jail are to be tested for COVID-19. All inmates who test negative shall be re-tested in 14 days from their booking. The Order further indicates that all inmates who test negative for PCR, but positive for Serology at the time of booking may be housed in general population.
21. In my review of the expert's opinion, it is clear that they rely on certain parts of the CDC guidelines in formulating their opinions.
22. The CDC issued "Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correction and Detention Centers" on March 23, 2020. These guidelines were intended to assist facilities in preventing the spread of the virus from outside the facility to inside the facility. Also, the CDC clearly points out that the guidelines are intended to be used and adapted as suited to one's own setting.
23. In review of Dr. Rottnek's report, I disagree with the opinion that Div. II should be closed because of COVID-19. Dr. Rottnek's opinion that preventative measures cannot be enacted to prevent the spread of the virus is false. This is illustrated by the test results, which Dr. Rottnek did not include in his report. Further, after testing, it is presumed that only negative people are being housed together which greatly minimized the risk of transmission. I believe that the opinion that preventative measures cannot be enacted, and that double bunking is reckless is false. Again, with the testing and preventative measures that have been put into place, the risk of transmission was minimized.

24. The idea that quarantining the prisoners is punishment is false. Quarantining is not only recommended in the CDC guidelines, it is the only way to protect the population from an outbreak.
25. Contrary to Dr. Luring, social distancing can be achieved in multiple ways pursuant to the CDC recommendations. One size does not fit all. Each facility will need to choose what works for them. Other examples of social distancing are serving meals in cells, sleeping head to foot, and suspending group programs where people will be in closer contact than in their housing environment, all things which were enacted by the Jail pursuant to the directives and orders.
26. For the reasons above, it is my professional judgment that individuals placed in any division of the Jail are not at a significantly higher risk of infection for COVID-19 when compared to the population in the community.
27. The Jail's population has been reduced to the point where social distancing can be achieved.
28. The medically vulnerable individuals with preexisting conditions (e.g., heart disease, chronic lung disease, chronic liver disease, suppressed immune systems, cancer, diabetes, hypertension, respiratory conditions, or who are over the age of 50 have been released if the risk to the public is tolerable.
29. From my review it is clear that Wayne County Jail and its stakeholders have headed the CDC recommendations and have enacted adequate pandemic plans to prevent the spread of COVID-19 in the Jail.

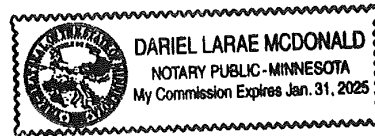
- a. Directive COJAC 20-04 signed **March 13, 2020**, which outlines officer guidelines per CDC guidance for identification and handling of COVID-19. The directive includes measures regarding transportation of inmates, isolation of new inmates, social distancing, and prevention.
- b. Directive COJAC 20-05 signed **March 20, 2020**, which requires all persons entering the building to undergo a temperature screening and health assessment. The screening and assessment process consisted of forehead temperature scans along with visual observation and a brief questionnaire. Any person coughing, sneezing, experiencing shortness of breath, or other obvious signs of illness shall also be denied entry.
- c. Directive COJAC 20-06 signed **March 21, 2020**, revised the prior directive requiring temperature screening and health screenings to coincide with the CDC recommendations.
- d. A directive from **March 24, 2020**, announcing biweekly distribution of N95 masks to all members of the staff.
- e. Directive COJAC 20-07, signed on **March 27, 2020**, which set a policy that all new book inmates entering the jail facilities will be screened and assessed for signs and symptoms of COVID-19 and will be quarantined for a minimum of 72 hours.
- f. Directive COJAC 20-08, signed on **March 31, 2020**, which required PPE for officers assigned hospital detail security. The directive also included a diagram of the proper method for donning and doffing of respirators.

Further affiant sayeth not.

Louis Shicker
LOUIS SHICKER, M.D.

Subscribed and sworn to before me
This 10 day of June 2020

Notary Public, State of Minnesota
County of Ramsey
My Commission Expires: Jan 31, 2025
Acting in the County of Ramsey



Louis Shicker MD CCHP-P
6550 N. Kimball Ave.
Lincolnwood, IL 60712
Ishicker@gmail.com
(847) 533-2979

Employment & Academic Appointments

*Medical Director Minnesota Correctional Health Care Contract
Centurion-MHM* *June '16 – present*

- **Oversee all contracted medical services to State Correctional Facilities**
- **In charge of utilization management for pharmacy and Specialty consultation**
- **Physician and mid-level evaluations**
- **Member of DOC-Vendor Pharmacy and Therapeutics Committee**
- **Member of Centurion Infectious Disease Committee**

*State of Illinois Dept. of Corrections
Chief of Medical Services* *November '09 - June '16*

- *Oversee all health related services and protocols for State prisons*

*Assistant Professor of Medicine-
University Of Illinois Medical Center - Chicago* *November '09 - June '16*

*Physician Care Ltd/Arlington Medical Group
Internist – Private Practice* *April '08 - July '09*

*Wexford Health Resources
Medical Director - Dwight Correctional Center* *March '03 – April '08
June 1st '09 Nov. '09*

Description:

- **Oversee all health care related services at facility including general health, emergency care, specialty care, psychiatric services, obstetric/gynecologic services, dental, optometry, and physical therapy.**
- **Responsible for the oversight of all on-site medical and dental personnel.**
- ***Provide direct care to infirmity patients and 32 hours per week of primary care clinic hours**

*Addus Healthcare Inc.
Attending Physician - Dwight Correctional Center* *Sept '02 - March '03*

Description:

- Independent contractor to provide primary care services

*Associate Professor of Clinical and Emergency Medicine
Finch University of Health Sciences/
The Chicago Medical School*

March '01 – June '07

*Chief Internist/Coordinator of Primary Care Services
Illinois Department of Human Services—
Office of Mental Health*

March '01-August '02

Description:

- * Oversee all primary care services at ten State Psychiatric Hospitals
- * Develop policies and procedures related to primary care
- * Develop medical protocols/guidelines
- * Serve on Statewide Infection Control Committee
- * Serve on Statewide Pharmacy and Therapeutics Committee
- * Coordinate education programs for primary care physicians
- * Establish medical linkage for discharged patients
- * Assist in the hiring and discharging of primary care staff
- * Serve on Interagency AIDS Task Force
- * Serve on Medical Clearance Task Force

*Assistant Medical Director for Primary Care
Elgin Mental Health Center
Elgin, IL*

1998 - 2001

Description:

- * Administrator for primary care services
- * Chair of Infection Control Committee
- * Member of Pharmacy and Therapeutics Committee
- * Member of Peer Review Committee (In charge of peer review of primary care staff)
- * Member of Executive Medical Staff

Assistant Professor of Medicine

*Rush Presbyterian Medical College
Chicago, IL*

1992 - 2001

Description:

- * Lecturer in internal medicine
- * Instructor in physical diagnosis course
- * Committee on Student Evaluations and Promotions (1997 - 1999)
- * Faculty Senate (1995 - 1996)

*Attending Physician
Department of Internal Medicine/Section of Emergency Services
Rush Presbyterian St. Luke's Medical Center
Chicago, IL*

1989 - 2001

Description:

- * Clinical attending
- * Supervise clinical work of residents
- * Research
- * Didactic teaching
- * Attending in observation unit
- * Quality assurance
- * Quality Monitoring Committee (1991 - 1993)
- * Disaster Committee (1995 - 1997)
- * ACLS Instructor

Reviewer for the Journal Critical Care Medicine

1998 - 2000

*Attending Physician
Emergency Department
Private Contractor—EMSCO
Edgewater Hospital
Chicago, IL*

1992 - 1993

Education

*Albert Einstein College of Medicine
Bronx, NY* 1982 - 1986

Degree Earned—MD

*Winner of two month Fellowship/Clerkship in Outpatient Medicine
Ben Gurion University
Be'er Sheva, Israel March 1986

*Yeshiva University
New York, NY* 1977 - 1981

Degree Earned—BA with Honors

- * Major—Biology
- * Minor—Psychology
- * Editor-in-Chief, *The Commentator*, the official undergraduate newspaper of Yeshiva University (1980 - 1981)
- * *Who's Who in American Colleges and Universities* (1981)
- * Alpha Epsilon Delta Premedical Honor Society (1979 - 1981)
- * Psi Chi Psychology Honor Society (1979 - 1981)

Postgraduate Training

*Occupational Medicine Training Course (4 week course)
Cincinnati, OH* Completed in
March, 1999

*Residency in Internal Medicine
Rush Presbyterian St. Luke's Medical Center
Chicago, IL* 1987 - 1989

*Internship in Internal Medicine
Rush Presbyterian St. Luke's Medical Center
Chicago, IL* 1986 - 1987

*Fellowship in Jewish Medical Ethics
Yeshiva University
New York, NY* 1981 - 1982

Certification and Licensure

<i>Licensed to practice medicine in Illinois</i>	<i>1987 – 2017</i>
<i>Licensed to practice medicine in Minnesota</i>	<i>2016 - present</i>
<i>American Board of Internal Medicine</i>	<i>1990 – Present</i>
<i>Certified Correctional Health Professional</i>	<i>2011 – present</i>
<i>Certified Correctional Health Professional – Physician</i>	<i>2017 – present</i>
<i>Certified in ACLS Re-Certified 5/2009</i>	<i>1990 - 2001</i>
<i>Certified in ATLS</i>	<i>1990 - 2000</i>
<i>Certified in APLS</i>	<i>1991 - 1997</i>

Professional Society Memberships

<i>American College of Physicians</i>	<i>1990- present</i>
<i>Association of Emergency Physicians</i>	<i>1998 - 2002</i>
<i>American College of Emergency Physicians</i>	<i>1992-1998</i>
<i>American Correctional Association (ACA)</i>	<i>January '10 – present</i>
<i>Illinois Health Authority for Coalition of Correctional Health Authorities for ACA</i>	<i>Nov. '09-June'16</i>
<i>* Vice Chair – ACA Research Council Committee</i>	<i>June'15 - June '16</i>
<i>Academy of Correctional Health Professionals of NCCHC</i>	<i>May '11 – present</i>
<i>American College of Correctional Physicians</i>	<i>2017 - present</i>

Publications and Presentations

CME Program Director for health care professionals at Illinois Department of Corrections in conjunction with Southern Illinois University School of Medicine - Springfield, Illinois June '10 – present

Panelist on: *What's New with Hepatitis C Treatment in Corrections?* National Hepatitis Corrections Network - Conference Boston, Mass. March 2015

Shicker L, et al *Correctional Medicine Challenges and Opportunities*. Disease-a-Month Volume 60 # 5 Pages 165-224 May 2014

Badowski M, Werner R, Young J, Vaughn P, Shicker L, Patel M, *Analysis of Baseline HIV Genotypes in Naïve Subjects with HIV in a Correctional Setting*. 2014 European Society of Clinical Microbiology and Infectious Disease Conference – Presented May 2014

Young JD, Vaughn P, Patel M, Badowski M, Shicker L, Puisis M, Mackesy-Amiti M, Oullet L.J. *Improved Virologic Suppression with HIV Subspecialty Care in a Large Prison System Using Telemedicine* (Abstract 5069). 4th International HIV Treatment as Prevention Workshop April 1 – 4 Vancouver, BC, Canada; Clinical Infectious Diseases – Brief Report May 7 2014

Clinical Ethics Grand Rounds – *Prisoner Care at UIHHSS: Legal, Ethical, and Policy Issues* Presented at University of Illinois Hospital April 2, 2014

Presentation on: *Protection After Exposure* – SIU sponsored CME Lecture at Illinois Department of Correction – Office of Health Services Meeting/Springfield, IL. Dec. '13

Presentation on: *Hunger Strikes in Prison - The Illinois Experience* SIU sponsored CME Lecture at the Quarterly Office of Health Care Services Meeting in Springfield, IL - March '10

Presentation on: *HIV Care in Prison* at MATEC (Midwest AIDS Teaching and Education Center) - Springfield, Illinois May '10

Presentation on: *New Approaches to the Treatment of HIV in Prisons* At the Illinois Department of Public Health Forum on AIDS and STD's Springfield, IL September '10

Panelist at the: *HIV & Incarceration: From Prevention to Care - Care and Treatment Behind Bars Panel* UIC-SPH Chicago, IL March '11

Dinwiddie SH, Shicker L, Newman T (BA): *Prevalence of Hepatitis C Among Psychiatric Patients in the Public Sector*. Am J of Psychiatry 160(1): 172-177 January 2003

Leikin JB, Orlowski J, Bizovi A, Shicker L, Mcallister K: *Hemodialysis Removal of Acyclovir*. Vet Hum Toxicol 37(3): 233-234. Presented as and abstract at the North American Congress of Clinical Toxicology September, 1994

Leikin JB, Lipscomb JW, Shicker L, Hryhorczuk DO, Barkin RL, Aks S, Ericson T, Kanter M, Paloucek FT, Bizovi K, Keys N, Rush Poison Control Center Staff. *Carbon Monoxide and the Carbon Monoxide Detector Ordinance: Why the Debate?* Chicago Medicine, 98(6): 13-15 1995

Shicker L, Book Review of *Ethics in Emergency Medicine*, 2nd edition, Iverson KV, Sanders AB, Mathieu DM. Chicago Medicine November, 1996

Leikin JB, Aks SE, Andrews S, Auerbach PS, Cooper MA, Jacobsen TD, Krenzlock EP, Shicker L, Weiner SL. *Environmental Injuries*. Roger C. Bone (9th edition) Disease-a-month. Mosby Yearbook 43(12) 1997

Resident Rounds—Review of Hypothermia December, 1995

Resident Rounds—Assessment and Management of Pneumothrax May, 1996

Presentation to Janssen Pharmaceutical on Basic EKG Interpretation and Understanding at Elgin Mental Health Center January, 2001

Grand Rounds Presentation at Elgin Mental Health Center: *Primary Care at State Operated Facilities—Possibilities & Practicalities* March 2002

Lecturer on Educational Video for Assessment and Management of Pain. Used as a training tool for health care professionals working for the State of Illinois Psychiatric Hospital System July, 2002

Panel presenter at Institute on Psychiatric Services/American Psychiatric Association: *Medical Clearance of Psychiatric Patients* October, 2002

Prospective Medical Clearance of Psychiatric Patients—Abstract submitted and accepted to ACEP Research Forum—Submitted for Journal Publication July, 2001

Personal and Professional References Upon Request

APPENDIX M

Register of Actions

Case No. 17-173217-CZ

REGISTER OF ACTIONS
[CASE No. 71-173217-CZ](#)

RELATED CASE INFORMATION

Related Cases

09-000978-AW (Prior Action)

PARTY INFORMATION

Defendant	WAYNE COUNTY COMMISSION	Lead Attorneys Felicia O. Johnson <i>Retained</i> (313) 224-6459(W)
Defendant	WAYNE COUNTY EXECUTIVE	James W. Heath <i>Retained</i> (313) 224-0264(W)
Defendant	WAYNE COUNTY SHERIFF	Mark J. Zausmer <i>Retained</i> (248) 851-4111(W)
Intervening Party	Local 3317 AFSCME Council 25	Jamil Akhtar <i>Retained</i> (517) 467-7373(W)
Plaintiff	Wayne County Jail Inmates	Deborah Ann Choly <i>Retained</i> (313) 964-4130(W)

EVENTS & ORDERS OF THE COURT

OTHER EVENTS AND HEARINGS	
01/01/1971	Complaint, Filed (Judicial Officer: Sapala, Michael F.)
06/12/1984	Circuit Court File and Record Received
06/21/1984	Order for Miscellaneous Action, Signed and Filed (Judicial Officer: Reilly, Maureen Pulte)
06/21/1984	Miscellaneous Judicial Hearing Activity (8:00 AM) (Judicial Officer Reilly, Maureen Pulte) Result: Reviewed by Court
08/06/1984	Order for Miscellaneous Action, Signed and Filed (Judicial Officer: Dunn, Richard D)
08/06/1984	Miscellaneous Judicial Hearing Activity (8:00 AM) (Judicial Officer Dunn, Richard D) Result: Reviewed by Court
04/05/1985	Answer to Motion, Filed
05/15/1985	Order for Miscellaneous Action, Signed and Filed (Judicial Officer: Dunn, Richard D)
05/15/1985	Miscellaneous Judicial Hearing Activity (8:00 AM) (Judicial Officer Dunn, Richard D) Result: Reviewed by Court
09/27/1985	Order to Show Cause, Signed and Filed (Judicial Officer: Dunn, Richard D)
09/27/1985	Miscellaneous Judicial Hearing Activity (8:00 AM) (Judicial Officer Dunn, Richard D) Result: Reviewed by Court
10/10/1985	Stipulation, Filed (Judicial Officer: Dunn, Richard D)
10/10/1985	Order for Miscellaneous Action, Signed and Filed (Judicial Officer: Dunn, Richard D)
10/15/1985	CANCELED Show Cause Hearing (8:00 AM) (Judicial Officer Dunn, Richard D) <i>Not Held</i>
11/08/1985	Motion Hearing (8:00 AM) (Judicial Officer Dunn, Richard D) Result: Adjourned
11/13/1985	Taken Under Advisement (Judicial Officer: Dunn, Richard D)
11/13/1985	Motion Hearing (8:00 AM) (Judicial Officer Dunn, Richard D) Result: Held
11/15/1985	CANCELED Motion Hearing (8:00 AM) (Judicial Officer Dunn, Richard D) <i>Not Held</i>
06/05/1986	Taken Under Advisement (Judicial Officer: Dunn, Richard D)
06/05/1986	Motion Hearing (8:00 AM) (Judicial Officer Dunn, Richard D) Result: Held
07/11/1986	Order for Miscellaneous Action, Signed and Filed (Judicial Officer: Dunn, Richard D)
07/11/1986	Miscellaneous Judicial Hearing Activity (8:00 AM) (Judicial Officer Dunn, Richard D) Result: Reviewed by Court
07/16/1986	Taken Under Advisement (Judicial Officer: Dunn, Richard D)
07/16/1986	Order to Show Cause, Signed and Filed (Judicial Officer: Dunn, Richard D)
07/16/1986	Motion Denied, Order to Follow (Judicial Officer: Dunn, Richard D)

07/16/1986 **Show Cause Hearing** (8:00 AM) (Judicial Officer Dunn, Richard D)
Result: Held

07/16/1986 **Motion Hearing** (8:00 AM) (Judicial Officer Dunn, Richard D)
Result: Held

07/16/1986 **Motion Hearing** (8:00 AM) (Judicial Officer Dunn, Richard D)
Result: Held

07/29/1986 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Dunn, Richard D)

07/29/1986 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Dunn, Richard D)

07/29/1986 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Dunn, Richard D)
Result: Reviewed by Court

07/29/1986 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Dunn, Richard D)
Result: Reviewed by Court

10/07/1986 **Case Reassigned** (Judicial Officer: Kaufman, Richard C)

10/07/1986 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

10/08/1986 **Granted in Part, Denied in Part** (Judicial Officer: Kaufman, Richard C)

10/08/1986 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

02/03/1987 **Objection, Filed**

04/09/1987 **Judgment, S/F** (Judicial Officer: Kaufman, Richard C)

04/09/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

04/10/1987 **Miscellaneous Party Update**

04/30/1987 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

04/30/1987 **Claim of Appeal Filed in 201**

04/30/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

05/12/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

05/12/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

05/14/1987 **Claim of Appeal Filed in 201**

05/20/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

05/20/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

05/29/1987 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

05/29/1987 **Brief, Filed**

05/29/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

06/12/1987 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

06/12/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

06/12/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

06/15/1987 **Answer to Motion, Filed**

06/19/1987 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Not Held

07/13/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

07/13/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

07/14/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

07/14/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

07/15/1987 **Proof of Service, Filed**

07/15/1987 **Petition, Filed**

08/10/1987 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)

08/10/1987 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)

08/10/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

08/10/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

08/17/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

08/17/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

08/19/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

08/19/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

09/10/1987 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

09/10/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

09/21/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

10/05/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

10/05/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

10/05/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

10/05/1987 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

11/02/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

11/02/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

11/05/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

11/05/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

11/05/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)

Result: Reviewed by Court
11/05/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/18/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/18/1987 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/18/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/18/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/23/1987 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/23/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/04/1987 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/04/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/17/1987 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/17/1987 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/01/1988 **Miscellaneous Motion, Filed**
01/14/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
01/14/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
01/14/1988 **Petition, Filed**
01/15/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/15/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/21/1988 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)
01/21/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
02/04/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
02/04/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/05/1988 **Objection, Filed**
02/16/1988 **Order to Show Cause, Signed and Filed** (Judicial Officer: Colombo, Robert J., Jr.)
02/16/1988 **Motion To Show Cause**
02/16/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Colombo, Robert J., Jr.)
Result: Reviewed by Court
02/17/1988 **Notice of Taking Deposition, Filed**
02/24/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
02/24/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
02/24/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
02/24/1988 **Motion to Adjourn, Filed**
02/24/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/25/1988 **Granted** (Judicial Officer: Kaufman, Richard C)
02/25/1988 **Show Cause Hearing** (8:00 AM) (Judicial Officer Colombo, Robert J., Jr.)
Result: Adjourned
02/25/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
03/01/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/01/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/01/1988 **Order Enforcing Judgment, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/01/1988 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecipe Dismissed
03/01/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/01/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/01/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/09/1988 **Subpoena Served, Filed**
03/15/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/15/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/04/1988 **Objection, Filed**
04/14/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/14/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/27/1988 **Objection, Filed**
05/02/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/02/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/11/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/11/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/13/1988 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
05/13/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/13/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/13/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/17/1988 **Received 7-Day Order for Entry**
05/25/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/25/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/02/1988 **Received 7-Day Order for Entry**

06/10/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/10/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/16/1988 **Received 7-Day Order for Entry**
06/16/1988 **Received 7-Day Order for Entry**
06/16/1988 **Received 7-Day Order for Entry**
06/21/1988 **Objection to 7-Day Order-Filed**
06/23/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/23/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/23/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/23/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/24/1988 **Received 7-Day Order for Entry**
06/24/1988 **Received 7-Day Order for Entry**
07/05/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/05/1988 **Order Extending Time, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/05/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/05/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/06/1988 **Received 7-Day Order for Entry**
07/06/1988 **Received 7-Day Order for Entry**
07/14/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
07/14/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
07/14/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/14/1988 **Order Granting Leave, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/14/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/14/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/19/1988 **Notice of Filing, Filed**
07/25/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/01/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/05/1988 **Received 7-Day Order for Entry**
08/11/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/11/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/15/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/15/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/16/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
08/16/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
08/16/1988 **Miscellaneous Motion, Filed**
08/16/1988 **Brief, Filed**
08/19/1988 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
08/19/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/19/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/19/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/23/1988 **Received 7-Day Order for Entry**
08/29/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
08/29/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
08/29/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praeipce Dismissed
08/29/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/31/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/31/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/01/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
09/01/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
09/06/1988 **Received 7-Day Order for Entry**
09/06/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
09/06/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
09/06/1988 **Appearance of Attorney, Filed**
09/07/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
09/07/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
09/07/1988 **Miscellaneous Motion, Filed**
09/09/1988 **Answer to Motion, Filed**
09/09/1988 **Motion to Disqualify Judge, Filed**
09/09/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
09/09/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
09/12/1988 **Order Granting Leave, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/12/1988 **Order Granting Leave, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/12/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
09/12/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
09/12/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)

Result: Reviewed by Court
09/12/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/13/1988 **Proof of Service, Filed**
09/13/1988 **Notice of Filing, Filed**
09/14/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/14/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
09/14/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/15/1988 **Answer to Motion, Filed**
09/15/1988 **Proof of Service, Filed**
09/15/1988 **Appearance of Attorney, Filed**
09/15/1988 **Brief, Filed**
09/15/1988 **Answer to Motion, Filed**
09/16/1988 **Steno Certificate - Filed**
09/16/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
09/16/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecipe Dismissed
09/16/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
09/16/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
09/16/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/16/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/16/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/16/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/16/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/22/1988 **Motion for Costs, Filed**
09/22/1988 **Motion for Attorney Fees, Filed**
09/23/1988 **Affidavit, Filed**
09/23/1988 **Brief, Filed**
09/23/1988 **Answer to Motion, Filed**
09/23/1988 **Brief, Filed**
09/23/1988 **Miscellaneous Response, Filed**
09/26/1988 **Evidentiary Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecipe Dismissed
10/03/1988 **Brief, Filed**
10/04/1988 **Miscellaneous Pleadings, Filed**
10/06/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/06/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/07/1988 **Received 7-Day Order for Entry**
10/10/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
10/10/1988 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Not Held
10/13/1988 **Order to Show Cause, Signed and Filed** (Judicial Officer: Battani, Marianne O)
10/13/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Battani, Marianne O)
Result: Reviewed by Court
10/14/1988 **Reply to Brief, Filed**
10/14/1988 **Miscellaneous Response, Filed**
10/14/1988 **Proof of Service, Filed**
10/14/1988 **Motion to Vacate Order, Filed**
10/17/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/17/1988 **Miscellaneous Request, Filed**
10/17/1988 **Show Cause Hearing** (8:00 AM) (Judicial Officer Battani, Marianne O)
Result: Adjourned
10/17/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/18/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
10/18/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
10/18/1988 **Miscellaneous Pleadings, Filed**
10/18/1988 **Miscellaneous Pleadings, Filed**
10/21/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
10/21/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
10/21/1988 **Miscellaneous Response, Filed**
10/21/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
10/21/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)

Result: Adjourned

10/24/1988 **Granted in Part, Denied in Part** (Judicial Officer: Kaufman, Richard C)

10/24/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

10/24/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

10/25/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

10/25/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

10/27/1988 **Granted** (Judicial Officer: Kaufman, Richard C)

10/27/1988 **Granted** (Judicial Officer: Kaufman, Richard C)

10/27/1988 **Order to Set Aside, Signed and Filed (does not change status)** (Judicial Officer: Kaufman, Richard C)

10/27/1988 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

10/27/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

10/27/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

10/27/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

10/28/1988 **Received 7-Day Order for Entry**

11/07/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

11/07/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

11/07/1988 **Received 7-Day Order for Entry**

11/10/1988 **Notice of Taking Deposition, Filed**

11/14/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

11/14/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

11/14/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

11/14/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

11/16/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

11/16/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

11/17/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

11/17/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

11/17/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

11/17/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

11/18/1988 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Not Held

11/22/1988 **Granted** (Judicial Officer: Kaufman, Richard C)

11/22/1988 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)

11/22/1988 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)

11/22/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

11/22/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

11/22/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

11/22/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

12/02/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

12/02/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

12/02/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

12/02/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

12/05/1988 **Received 7-Day Order for Entry**

12/05/1988 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

12/05/1988 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

12/06/1988 **Motion to Compel Action Granted, Order to Follow** (Judicial Officer: Kaufman, Richard C)

12/06/1988 **Motion to Compel Action Granted, Order to Follow** (Judicial Officer: Kaufman, Richard C)

12/06/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

12/06/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

12/07/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Colombo, Robert J., Jr.)

12/07/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Colombo, Robert J., Jr.)
Result: Reviewed by Court

12/12/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

12/12/1988 **Received 7-Day Order for Entry**

12/12/1988 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

12/12/1988 **Order to Show Cause, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

12/12/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

12/12/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

12/12/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

12/14/1988 **Circuit Court File and Record Received**

12/15/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

12/15/1988 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

12/19/1988 **Brief, Filed**

12/19/1988 **Proof of Service, Filed**

12/20/1988 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

12/20/1988 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

12/20/1988 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

12/20/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

12/22/1988 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

12/22/1988 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

01/03/1989 **Received 7-Day Order for Entry**

01/03/1989 **Received 7-Day Order for Entry**

01/11/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

01/11/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

01/11/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

01/11/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

01/25/1989 **Circuit Court File and Record Received**

01/25/1989 **Circuit Court File and Record Received**

01/26/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

01/26/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

01/26/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

02/03/1989 **Circuit Court File and Record Received**

02/06/1989 **Received 7-Day Order for Entry**

02/14/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

02/14/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

02/16/1989 **Opinion of Court, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

02/16/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

02/16/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

02/16/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

03/03/1989 **Claim of Appeal Filed in 201**

03/13/1989 **Received 7-Day Order for Entry**

03/15/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

03/15/1989 **Transcript - Filed**

03/15/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

03/16/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)

03/16/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)

03/16/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

03/16/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

03/16/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

03/20/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecepte Dismissed

03/20/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecepte Dismissed

03/22/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

03/22/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

03/30/1989 **Transcript - Filed**

03/31/1989 **Order to Show Cause, Signed and Filed** (Judicial Officer: Battani, Marianne O)

03/31/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Battani, Marianne O)
Result: Held

04/04/1989 **Circuit Court File and Record Received**

04/06/1989 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

04/06/1989 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)

04/06/1989 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Battani, Marianne O)
Not Held

04/06/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

04/06/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

04/10/1989 **Received 7-Day Order for Entry**

04/10/1989 **Proof of Service, Filed**

04/13/1989 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

04/13/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

04/13/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned

04/13/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held

04/13/1989 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Not Held

04/14/1989 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

04/14/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court

04/19/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/19/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/27/1989 **Received 7-Day Order for Entry**
04/27/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
04/28/1989 **Circuit Court File & Record Sent**
05/05/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/05/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/09/1989 **Received 7-Day Order for Entry**
05/09/1989 **Circuit Court File & Record Sent**
05/10/1989 **Answer to Motion, Filed**
05/15/1989 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/15/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
05/16/1989 **Received 7-Day Order for Entry**
05/17/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/17/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/24/1989 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/24/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/31/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
05/31/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
06/01/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
06/05/1989 **Received 7-Day Order for Entry**
06/05/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
06/05/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
06/07/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
06/07/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
06/12/1989 **Notice of Hearing, Filed**
06/13/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/13/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/15/1989 **Interrogatories, Filed**
06/19/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
06/19/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
06/21/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
06/21/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
06/28/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/28/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
06/28/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praeceptum Dismissed
06/28/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praeceptum Dismissed
07/06/1989 **Received 7-Day Order for Entry**
07/10/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praeceptum Dismissed
07/13/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/13/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
07/13/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
07/13/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/18/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
07/18/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
07/19/1989 **Notice of Taking Deposition, Filed**
07/19/1989 **Notice of Taking Deposition, Filed**
07/20/1989 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
07/20/1989 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
08/03/1989 **Received 7-Day Order for Entry**
08/07/1989 **Received 7-Day Order for Entry**
08/09/1989 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)
08/09/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/09/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
08/14/1989 **Granted in Part, Denied in Part** (Judicial Officer: Kaufman, Richard C)
08/14/1989 **Granted in Part, Denied in Part** (Judicial Officer: Kaufman, Richard C)
08/14/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/14/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
08/14/1989 **Show Cause Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
08/14/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
08/14/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/15/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/15/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)

Result: Reviewed by Court
08/18/1989 **Opinion of Court, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/18/1989 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/18/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/18/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/05/1989 **Received 7-Day Order for Entry**
09/13/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/13/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecipe Dismissed
09/13/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/18/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
10/16/1989 **Received 7-Day Order for Entry**
10/18/1989 **Received 7-Day Order for Entry**
10/24/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/24/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/25/1989 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecipe Dismissed
10/26/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/26/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/02/1989 **Received 7-Day Order for Entry**
11/13/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/13/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/30/1989 **Received 7-Day Order for Entry**
11/30/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/30/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/05/1989 **Received 7-Day Order for Entry**
12/08/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/08/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/12/1989 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
12/12/1989 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/13/1989 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/13/1989 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/28/1989 **Motion for Costs, Filed**
01/02/1990 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
01/02/1990 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
01/05/1990 **Received 7-Day Order for Entry**
01/05/1990 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
01/05/1990 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
01/05/1990 **Motion for Costs, Filed**
01/10/1990 **Proof of Service, Filed**
01/16/1990 **Answer to Motion, Filed**
01/16/1990 **Answer to Motion, Filed**
01/17/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/17/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/24/1990 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
01/24/1990 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Not Held
02/07/1990 **Motion for Fees Granted, Order to Follow** (Judicial Officer: Kaufman, Richard C)
02/07/1990 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
02/12/1990 **Received 7-Day Order for Entry**
02/15/1990 **Received 7-Day Order for Entry**
02/20/1990 **Objection to 7-Day Order-Filed**
02/20/1990 **Objection to 7-Day Order-Filed**
02/20/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
02/20/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/21/1990 **Received 7-Day Order for Entry**
02/27/1990 **Received 7-Day Order for Entry**
02/27/1990 **Circuit Court File and Record Received**
03/05/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/05/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/07/1990 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/07/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/09/1990 **Received 7-Day Order for Entry**
03/19/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/19/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/06/1990 **Received 7-Day Order for Entry**
04/16/1990 **Received 7-Day Order for Entry**

04/16/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/16/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/24/1990 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/24/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/08/1990 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
05/08/1990 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/10/1990 **Received 7-Day Order for Entry**
05/16/1990 **Appearance of Attorney, filed**
05/16/1990 **Proof of Service, Filed**
05/18/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/18/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/07/1990 **Received 7-Day Order for Entry**
06/18/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/18/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/02/1990 **Received 7-Day Order for Entry**
07/10/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Battani, Marianne O)
07/10/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Battani, Marianne O)
Result: Reviewed by Court
08/03/1990 **Received 7-Day Order for Entry**
08/13/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/13/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/22/1990 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
08/22/1990 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
09/14/1990 **Answer to Motion, Filed**
09/19/1990 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
10/08/1990 **Received 7-Day Order for Entry**
10/16/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/16/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/16/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/16/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/17/1990 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
10/22/1990 **Received 7-Day Order for Entry**
10/29/1990 **Miscellaneous Pleadings, Filed**
10/30/1990 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/30/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/01/1990 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
11/01/1990 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/02/1990 **Miscellaneous Pleadings, Filed**
11/06/1990 **Received 7-Day Order for Entry**
11/06/1990 **Notice of Taking Deposition, Filed**
11/06/1990 **Miscellaneous Pleadings, Filed**
11/13/1990 **CANCELLED Evidentiary Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Not Held
11/14/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/14/1990 **Notice of Taking Deposition, Filed**
11/14/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/19/1990 **Evidentiary Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
12/05/1990 **Received 7-Day Order for Entry**
12/10/1990 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
12/10/1990 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/11/1990 **Evidentiary Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecipe Dismissed
12/13/1990 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/13/1990 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/02/1991 **Received 7-Day Order for Entry**
01/02/1991 **Objection to 7-Day Order-Filed**
01/02/1991 **Proof of Service, Filed**
01/03/1991 **Received 7-Day Order for Entry**
01/07/1991 **Objection to 7-Day Order-Filed**
01/16/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/16/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/05/1991 **Received 7-Day Order for Entry**
02/11/1991 **Received 7-Day Order for Entry**
02/13/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
02/13/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/19/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
02/19/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/21/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)

02/21/1991 **Received 7-Day Order for Entry**
02/21/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/01/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/01/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/04/1991 **Received 7-Day Order for Entry**
03/12/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/12/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/28/1991 **Received 7-Day Order for Entry**
04/04/1991 **Objection to 7-Day Order-Filed**
04/05/1991 **Received 7-Day Order for Entry**
04/15/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/15/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/22/1991 **Received 7-Day Order for Entry**
04/25/1991 **Received 7-Day Order for Entry**
04/29/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/29/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/30/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/30/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/03/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/03/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/06/1991 **Received 7-Day Order for Entry**
05/14/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/14/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/20/1991 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Not Held
06/03/1991 **Received 7-Day Order for Entry**
06/11/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/11/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/08/1991 **Received 7-Day Order for Entry**
07/16/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Battani, Marianne O)
07/16/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Battani, Marianne O)
Result: Reviewed by Court
07/29/1991 **Received 7-Day Order for Entry**
08/06/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/06/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/12/1991 **Received 7-Day Order for Entry**
08/20/1991 **Received 7-Day Order for Entry**
08/20/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/20/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/28/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/28/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/06/1991 **Received 7-Day Order for Entry**
09/16/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/16/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/03/1991 **Received 7-Day Order for Entry**
10/11/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/11/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/06/1991 **Received 7-Day Order for Entry**
11/14/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/14/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/25/1991 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/25/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/03/1991 **Received 7-Day Order for Entry**
12/10/1991 **Received 7-Day Order for Entry**
12/11/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/11/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/18/1991 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/18/1991 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/19/1991 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
12/19/1991 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
01/02/1992 **Received 7-Day Order for Entry**
01/06/1992 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
01/06/1992 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
01/06/1992 **Answer to Motion, Filed**
01/06/1992 **Miscellaneous Motion, Filed**
01/07/1992 **Answer to Motion, Filed**

01/08/1992 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)
01/08/1992 **Taken Under Advisement** (Judicial Officer: Kaufman, Richard C)
01/08/1992 **Miscellaneous Pleadings, Filed**
01/08/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
01/08/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
01/10/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/10/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/15/1992 **Petition filed** (Judicial Officer: Kaufman, Richard C)
01/15/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/15/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecepte Dismissed
01/15/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praecepte Dismissed
02/04/1992 **Received 7-Day Order for Entry**
02/12/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
02/12/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/03/1992 **Received 7-Day Order for Entry**
03/04/1992 **Received 7-Day Order for Entry**
03/12/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/12/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/12/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/12/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/31/1992 **Received 7-Day Order for Entry**
04/02/1992 **Received 7-Day Order for Entry**
04/03/1992 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
04/03/1992 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
04/08/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/08/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/13/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/13/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/15/1992 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/15/1992 **Opinion of Court, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/15/1992 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/15/1992 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/15/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
04/15/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
04/15/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/15/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/21/1992 **Miscellaneous Motion, Filed**
04/21/1992 **Brief, Filed**
04/22/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/22/1992 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
04/22/1992 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
04/22/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/27/1992 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
04/27/1992 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
04/29/1992 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
04/29/1992 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
04/29/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
04/29/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Adjourned
05/06/1992 **Received 7-Day Order for Entry**
05/07/1992 **Received 7-Day Order for Entry**
05/11/1992 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
05/11/1992 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
05/13/1992 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/13/1992 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/13/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
05/13/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
05/14/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/14/1992 **Objection to 7-Day Order-Filed**
05/14/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/20/1992 **Order Denying Motion, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/20/1992 **Granted, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/20/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
05/20/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)

Result: Held
05/29/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/29/1992 **Miscellaneous Motion, Filed**
05/29/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Held
06/05/1992 **Received 7-Day Order for Entry**
06/11/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/11/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/17/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
06/17/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/06/1992 **Received 7-Day Order for Entry**
07/06/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/06/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/06/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/06/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/14/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/14/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/20/1992 **Steno Certificate, Filed**
07/20/1992 **Transcript Ordered**
07/20/1992 **Steno Certificate Required**
07/20/1992 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
07/20/1992 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
07/24/1992 **Claim of Appeal Filed in 201**
08/05/1992 **Received 7-Day Order for Entry**
08/05/1992 **Received 7-Day Order for Entry**
08/24/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/24/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/24/1992 **Received 7-Day Order for Entry**
08/24/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/24/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/26/1992 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praeipce Dismissed
09/02/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/02/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/25/1992 **Received 7-Day Order for Entry**
10/05/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/05/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/06/1992 **Steno Certificate Required**
10/06/1992 **Transcript, Filed**
10/07/1992 **Transcript - Filed**
10/08/1992 **Received 7-Day Order for Entry**
10/16/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/16/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/23/1992 **Received 7-Day Order for Entry**
11/02/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/02/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/16/1992 **Received 7-Day Order for Entry**
11/24/1992 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/24/1992 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/04/1992 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
12/04/1992 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/06/1993 **Received 7-Day Order for Entry**
01/07/1993 **Received 7-Day Order for Entry**
01/07/1993 **Received 7-Day Order for Entry**
01/14/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/14/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/15/1993 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/15/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/15/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/15/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/17/1993 **Received 7-Day Order for Entry**
02/25/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
02/25/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/19/1993 **Received 7-Day Order for Entry**
03/23/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/23/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/07/1993 **Received 7-Day Order for Entry**

04/15/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
04/15/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/29/1993 **Received 7-Day Order for Entry**
05/07/1993 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/07/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
05/13/1993 **Received 7-Day Order for Entry**
05/24/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
05/24/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
06/23/1993 **Received 7-Day Order for Entry**
07/06/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/06/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
07/19/1993 **Received 7-Day Order for Entry**
07/27/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
07/27/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
08/16/1993 **Received 7-Day Order for Entry**
08/24/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
08/24/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
09/07/1993 **Received 7-Day Order for Entry**
09/15/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
09/15/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/11/1993 **Received 7-Day Order for Entry**
10/11/1993 **Received 7-Day Order for Entry**
10/19/1993 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/19/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
10/19/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
10/19/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
11/08/1993 **Received 7-Day Order for Entry**
11/16/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
11/16/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/09/1993 **Received 7-Day Order for Entry**
12/16/1993 **Received 7-Day Order for Entry**
12/16/1993 **Received 7-Day Order for Entry**
12/17/1993 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/17/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/29/1993 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/29/1993 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
12/29/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
12/29/1993 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
01/13/1994 **Received 7-Day Order for Entry**
01/18/1994 **Stipulation, Filed** (Judicial Officer: Kaufman, Richard C)
01/18/1994 **Order for Discovery, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/24/1994 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
01/24/1994 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
02/22/1994 **Received 7-Day Order for Entry**
02/23/1994 **Motion Filed** (Judicial Officer: Kaufman, Richard C)
02/23/1994 **Motion Hearing Scheduled** (Judicial Officer: Kaufman, Richard C)
03/02/1994 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/02/1994 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
03/04/1994 **Motion Hearing** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Motion and/or Praeipice Dismissed
03/04/1994 **Motion Hearing** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Adjourned
03/14/1994 **Received 7-Day Order for Entry**
03/17/1994 **Motion Hearing** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Adjourned
03/22/1994 **Order for Fees, Signed and Filed** (Judicial Officer: Kaufman, Richard C)
03/22/1994 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Kaufman, Richard C)
Result: Reviewed by Court
04/11/1994 **Reassignment - Administrative, Signed and Filed** (Judicial Officer: Rashid, James J)
04/11/1994 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court
04/20/1994 **Motion Hearing** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Adjourned
05/11/1994 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)
05/11/1994 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)
05/11/1994 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Rashid, James J)
Not Held
05/11/1994 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

10/10/1997 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

10/23/1997 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

10/23/1997 **Motion Hearing** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Held

10/28/1997 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Rashid, James J)

10/28/1997 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

10/30/1997 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

10/30/1997 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

11/10/1997 **CANCELED Settlement Conference** (9:00 AM) (Judicial Officer Rashid, James J)
Not Held

11/17/1997 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

11/17/1997 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

11/17/1997 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

11/17/1997 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

12/18/1997 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

12/18/1997 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

12/22/1997 **Stipulation, Filed** (Judicial Officer: Rashid, James J)

12/22/1997 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

12/22/1997 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

12/22/1997 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

12/22/1997 **Motion Hearing** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Held

12/22/1997 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

01/30/1998 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

01/30/1998 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

01/30/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

01/30/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

03/25/1998 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

03/25/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

04/21/1998 **Order, Signed and Filed** (Judicial Officer: Rashid, James J)

04/21/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

06/15/1998 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

06/15/1998 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Rashid, James J)

06/15/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

06/15/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

07/16/1998 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

07/16/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

08/31/1998 **Order Appointing House Counsel, Signed and Filed** (Judicial Officer: Rashid, James J)

08/31/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

10/19/1998 **Order Substituting Defendant Attorney, Signed and Filed** (Judicial Officer: Rashid, James J)

10/19/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

10/27/1998 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

10/27/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

10/29/1998 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

10/29/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

12/17/1998 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

12/17/1998 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

01/19/1999 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

01/19/1999 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

02/26/1999 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

02/26/1999 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

03/29/1999 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Rashid, James J)

03/29/1999 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Rashid, James J)
Result: Reviewed by Court

01/31/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

01/31/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court

02/07/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

02/07/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court

03/21/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

03/21/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court

04/19/2000 **Motion Filed** (Judicial Officer: Sapala, Michael F.)
04/19/2000 **Motion Hearing Scheduled** (Judicial Officer: Sapala, Michael F.)
04/19/2000 **Motion for Miscellaneous Action Granted, Order to Follow** (Judicial Officer: Sapala, Michael F.)
04/19/2000 **Motion Hearing** (2:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
04/21/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
04/21/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
04/21/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
04/21/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
06/23/2000 **Affidavit, Filed**
06/23/2000 **Certificate, Filed**
07/03/2000 **Motion Filed** (Judicial Officer: Sapala, Michael F.)
07/03/2000 **Motion Hearing Scheduled** (Judicial Officer: Sapala, Michael F.)
07/03/2000 **Miscellaneous Motion, Filed**
07/07/2000 **Motion Hearing** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Adjourned
07/11/2000 **Notice of Hearing, Filed**
07/11/2000 **Letter, Filed**
07/11/2000 **Affidavit Mailing/Service, filed**
07/19/2000 **CANCELED Motion Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Not Held
07/26/2000 **Motion Filed** (Judicial Officer: Sapala, Michael F.)
07/26/2000 **Motion Hearing Scheduled** (Judicial Officer: Sapala, Michael F.)
08/01/2000 **Motion for Miscellaneous Action Granted, Order to Follow** (Judicial Officer: Sapala, Michael F.)
08/01/2000 **Motion Filed** (Judicial Officer: Sapala, Michael F.)
08/01/2000 **Motion Hearing Scheduled** (Judicial Officer: Sapala, Michael F.)
08/01/2000 **Motion Hearing** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
08/04/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
08/04/2000 **Case Reassigned** (Judicial Officer: Colombo, Robert J., Jr.)
08/04/2000 **Motion for Miscellaneous Action Granted, Order to Follow** (Judicial Officer: Sapala, Michael F.)
08/04/2000 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Not Held
08/04/2000 **CANCELED Motion Hearing** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Not Held
08/04/2000 **CANCELED Motion Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Not Held
08/04/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
08/04/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Colombo, Robert J., Jr.)
Result: Reviewed by Court
08/04/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
08/22/2000 **Motion for Miscellaneous Action Granted, Order to Follow** (Judicial Officer: Sapala, Michael F.)
08/22/2000 **Review Hearing** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Adjourned
08/22/2000 **Review Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
08/23/2000 **CANCELED Review Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Not Held
08/31/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
08/31/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
09/11/2000 **Dismiss Hearing or Injunction** (Judicial Officer: Sapala, Michael F.)
09/11/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
09/12/2000 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)
09/12/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
09/12/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
09/12/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
09/14/2000 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
09/14/2000 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
09/18/2000 **CANCELED Status Conference** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Not Held
09/29/2000 **Motion for Order**
09/29/2000 **Motion Filed** (Judicial Officer: Sapala, Michael F.)
09/29/2000 **Motion Hearing Scheduled** (Judicial Officer: Sapala, Michael F.)
09/29/2000 **Motion Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Motion and/or Praecipe Dismissed
01/10/2001 **Order Compelling Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
01/10/2001 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
03/13/2001 **Petition filed** (Judicial Officer: Sapala, Michael F.)
03/13/2001 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
03/13/2001 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
03/13/2001 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
10/20/2005 **Case Scheduled** (Judicial Officer: Sapala, Michael F.)
10/20/2005 **Miscellaneous Judicial Hearing Activity** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court

11/07/2005 **Settlement Conference** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Adjourned

11/09/2005 **CANCELED Settlement Conference** (8:30 AM) (Judicial Officer Sapala, Michael F.)
Not Held

11/16/2005 **Order, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

11/16/2005 **Settlement Conference** (8:30 AM) (Judicial Officer Sapala, Michael F.)
Result: Held

10/24/2008 **Heard** (Judicial Officer: Torres, Isidore)

10/24/2008 **Stipulation, Filed** (Judicial Officer: Torres, Isidore)

10/24/2008 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Torres, Isidore)

10/24/2008 **Miscellaneous Motion, Filed**

10/24/2008 **Motion To Show Cause**

10/24/2008 **Motion Hearing** (8:00 AM) (Judicial Officer Torres, Isidore)
Result: Held

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)

10/28/2008 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

10/28/2008 **Affidavit, Filed**

10/28/2008 **Affidavit, Filed**

10/28/2008 **Motion Hearing** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Adjourned

10/29/2008 **Order Denying Motion, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

10/29/2008 **Motion Filed** (Judicial Officer: Sapala, Michael F.)

10/29/2008 **Motion Hearing Scheduled** (Judicial Officer: Sapala, Michael F.)

10/29/2008 **Affidavit, Filed**

10/29/2008 **Reply to Brief, Filed**

10/29/2008 **Motion Hearing** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held

10/29/2008 **Motion Hearing** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Adjourned

10/29/2008 **Motion to Disqualify Judge, Filed** (Judicial Officer: Giovan, William J.)

10/29/2008 **Motion Denied, Order to Follow** (Judicial Officer: Giovan, William J.)

10/30/2008 **Affidavit, Filed**

10/31/2008 **Motion Hearing** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Adjourned

10/31/2008 **Appearance of Attorney, Filed**

10/31/2008 **Miscellaneous Pleadings, Filed**

11/03/2008 **CANCELED Motion Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Not Held

11/03/2008 **Motion Hearing** (1:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement

11/05/2008 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)

11/05/2008 **Order Substituting Defendant Attorney, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

11/05/2008 **Motion Denied, Order to Follow** (Judicial Officer: Giovan, William J.)

11/06/2008 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)

11/06/2008 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

11/10/2008 **Motion Hearing** (10:00 AM) (Judicial Officer Sapala, Michael F.)
11/05/2008 Reset by Court to 11/11/2008
11/11/2008 Reset by Court to 11/10/2008
Result: Held

11/11/2008 **Motion Hearing** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held

11/11/2008 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)

11/11/2008 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

11/17/2008 **Motion Hearing** (9:30 AM) (Judicial Officer Sapala, Michael F.)
Result: Held

11/17/2008 **Memorandum of Law, Filed**

11/17/2008 **Certificate, Filed**

11/17/2008 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

11/20/2008 **Exhibit, Filed**

11/20/2008 **Certificate, Filed**

11/20/2008 **General Brief, Filed**

11/20/2008 **Proof of Service, Filed**

11/21/2008 **Motion Hearing** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held

11/21/2008 **Opinion Rendered, Order to Follow** (Judicial Officer: Sapala, Michael F.)

11/24/2008 **Special Conference** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held

11/25/2008 **Special Conference** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held

12/01/2008 **Certificate, Filed**

12/02/2008 **Injunctive/Restraining Order, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

12/04/2008 **Petition For Order to Show Cause, Filed**

12/04/2008 **Notice of Hearing, Filed**

12/04/2008 **General Brief, Filed**

12/04/2008 **Affidavit, Filed**

12/04/2008 **Proof of Service, Filed**

12/05/2008 **Motion Hearing** (2:30 PM) (Judicial Officer Sapala, Michael F.)

Result: Held
12/05/2008 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)
12/05/2008 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
12/05/2008 **Answer to Motion, Filed**
12/05/2008 **Certificate, Filed**
12/22/2008 **Special Conference** (11:30 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
01/05/2009 **Motion to Compel Action, Filed**
01/05/2009 **Notice of Hearing, Filed**
01/05/2009 **Answer to Motion, Filed**
01/06/2009 **Special Conference** (10:00 AM) (Judicial Officer Sapala, Michael F.)
01/16/2009 Reset by Court to 01/06/2009
Result: Reviewed by Court
01/06/2009 **Motion Hearing** (10:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
01/06/2009 **Motion Hearing** (10:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
01/06/2009 **Motion to Compel Action Granted, Order to Follow** (Judicial Officer: Sapala, Michael F.)
01/06/2009 **Motion for Miscellaneous Action Granted, Order to Follow** (Judicial Officer: Sapala, Michael F.)
01/07/2009 **Received 7-Day Order for Entry**
01/09/2009 **Objection to 7-Day Order, Filed**
01/09/2009 **Certificate, Filed**
01/09/2009 **Objection, Filed**
01/09/2009 **Notice of Hearing, Filed**
01/09/2009 **Appearance of Attorney, Filed**
01/09/2009 **Certificate, Filed**
01/12/2009 **Special Conference** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
01/12/2009 **Motion Hearing** (8:30 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
01/12/2009 **Appearance of Attorney, Filed**
01/12/2009 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
01/12/2009 **7-Day Order Not Enter** (Judicial Officer: Sapala, Michael F.)
01/12/2009 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)
01/12/2009 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
01/14/2009 **Appearance of Attorney, Filed**
01/22/2009 **CANCELED Evidentiary Hearing** (9:30 AM) (Judicial Officer Sapala, Michael F.)
Dismiss Hearing or Injunction
02/02/2009 **Memorandum of Law, Filed**
02/02/2009 **Proof of Service, Filed**
02/02/2009 **General Brief, Filed**
02/02/2009 **Certificate, Filed**
02/03/2009 **Evidentiary Hearing** (9:30 AM) (Judicial Officer Sapala, Michael F.)
01/21/2009 Reset by Court to 02/03/2009
02/03/2009 Reset by Court to 02/03/2009
Result: Held
02/04/2009 **Evidentiary Hearing** (9:30 AM) (Judicial Officer Sapala, Michael F.)
02/04/2009 Reset by Court to 02/04/2009
Result: Held
02/06/2009 **Telephone Conference** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
02/11/2009 **Evidentiary Hearing** (1:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
02/12/2009 **Evidentiary Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
03/11/2009 **Telephone Conference** (9:30 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
03/23/2009 **Telephone Conference** (4:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
04/21/2009 **Evidentiary Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
03/18/2009 Reset by Court to 04/14/2009
04/14/2009 Reset by Court to 04/21/2009
Result: Held
04/28/2009 **Evidentiary Hearing** (1:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Bench Trial in Progress
05/13/2009 **Miscellaneous Pleadings, Filed**
05/14/2009 **Certificate, Filed**
05/14/2009 **General Brief, Filed**
05/15/2009 **Evidentiary Hearing** (11:30 AM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
05/18/2009 **Telephone Conference** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
05/21/2009 **Evidentiary Hearing** (8:30 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
05/21/2009 **Opinion Rendered, Order to Follow** (Judicial Officer: Sapala, Michael F.)
05/21/2009 **Reply to Brief, Filed**
05/21/2009 **Answer to Request, Filed**
05/21/2009 **Certificate, Filed**
05/22/2009 **Trial Brief, Filed**
05/22/2009 **Proof of Service, Filed**
06/01/2009 **Received 7-Day Order for Entry**
06/01/2009 **Proof of Service, Filed**

06/04/2009 **Objection to 7-Day Order, Filed**
06/04/2009 **Objection to 7-Day Order, Filed**
06/04/2009 **Motion Received for Scheduling**
06/04/2009 **Motion for Objection, Filed**
06/04/2009 **Proof of Service, Filed**
06/04/2009 **Notice of Hearing, Filed**
06/09/2009 **Motion Hearing** (11:00 AM) (Judicial Officer Sapala, Michael F.)
06/09/2009 Reset by Court to 06/09/2009
Result: Held
06/09/2009 **7-Day Order Not Enter** (Judicial Officer: Sapala, Michael F.)
06/09/2009 **Answer to Objection, Filed**
06/11/2009 **Stipulation, Filed**
06/11/2009 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
06/12/2009 **Certificate, Filed**
06/23/2009 **Motion Received for Scheduling**
06/23/2009 **Motion for Reconsideration/Rehearing, Filed**
06/26/2009 **Order Denying Motion, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
07/15/2009 **CANCELED Motion Hearing** (8:00 AM) (Judicial Officer Sapala, Michael F.)
Dismiss Hearing or Injunction
07/17/2009 **Claim of Appeal, Filed**
08/04/2009 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
08/21/2009 **Motion Transcript Ordered**
08/21/2009 **Steno Certificate, Filed**
08/21/2009 **Motion Transcript Ordered**
08/21/2009 **Steno Certificate, Filed**
08/21/2009 **Motion Transcript Ordered**
08/21/2009 **Steno Certificate, Filed**
08/28/2009 **Special Conference** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
08/31/2009 **Stipulation, Filed**
08/31/2009 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
09/04/2009 **Appearance of Attorney, Filed**
09/04/2009 **Proof of Service, Filed**
09/17/2009 **Transcript, Filed**
09/25/2009 **Special Conference** (2:30 PM) (Judicial Officer Sapala, Michael F.)
09/25/2009 Reset by Court to 09/25/2009
Result: Held for Further Settlement
10/06/2009 **Status Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
10/06/2009 **Stipulation, Filed** (Judicial Officer: Sapala, Michael F.)
10/06/2009 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
11/10/2009 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Smith, Virgil Clark)
11/17/2009 **Transcript, Filed**
11/19/2009 **Status Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
11/24/2009 **Transcript, Filed**
12/18/2009 **Stipulation, Filed**
12/18/2009 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
01/19/2010 **Status Conference** (1:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
03/31/2010 **Special Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
04/15/2010 **File Sent**
04/27/2010 **Status Conference** (1:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
06/10/2010 **Status Conference** (12:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
08/12/2010 **Status Conference** (12:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
09/08/2010 **Special Conference** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
10/28/2010 **Status Conference** (1:00 PM) (Judicial Officer Sapala, Michael F.)
10/14/2010 Reset by Court to 10/28/2010
10/14/2010 Reset by Court to 10/15/2010
10/15/2010 Reset by Court to 10/14/2010
Result: Held
12/14/2010 **Status Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
01/06/2011 **Telephone Conference** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
01/06/2011 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
01/07/2011 **Higher Court Order/Decision Received by Circuit Court**
01/31/2011 **Higher Court Order/Decision Received by Circuit Court**
02/15/2011 **Status Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
05/17/2011 **Received 7-Day Order for Entry**
05/25/2011 **No Objections Received to 7-Day Order**
05/25/2011 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
05/26/2011 **Status Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
04/21/2011 Reset by Court to 05/26/2011
Result: Held
05/26/2011 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Sapala, Michael F.)

06/02/2011 **Proof of Service, Filed**
06/02/2011 **Proof of Service, Filed**
07/14/2011 **Evidentiary Hearing** (9:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
07/25/2011 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
09/06/2011 **CANCELED Status Conference** (1:00 PM) (Judicial Officer Sapala, Michael F.)
Dismiss Hearing or Injunction
10/26/2011 **Status Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
01/17/2012 **Status Conference** (2:00 PM) (Judicial Officer Sapala, Michael F.)
12/20/2011 Reset by Court to 01/17/2012
12/20/2011 Reset by Court to 01/06/2012
01/06/2012 Reset by Court to 12/20/2011
Result: Held
02/06/2012 **Status Conference** (1:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
05/17/2012 **Status Conference** (1:00 PM) (Judicial Officer Sapala, Michael F.)
05/25/2012 **Status Conference** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
07/16/2012 **Special Conference** (3:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
07/16/2012 **Miscellaneous Action** (Judicial Officer: Sapala, Michael F.)
07/23/2012 **Order Amending, File Supplemental Pleading, Signed and Filed** (Judicial Officer: Sapala, Michael F.)
08/07/2012 **Motion to Compel Action, Filed**
08/07/2012 **Motion Received for Scheduling**
08/09/2012 **Special Conference** (1:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
08/17/2012 **CANCELED Status Conference** (11:00 AM) (Judicial Officer Sapala, Michael F.)
Dismiss Hearing or Injunction
08/09/2012 Reset by Court to 08/17/2012
08/29/2012 **Telephone Conference** (10:45 AM) (Judicial Officer Sapala, Michael F.)
Result: Held
09/05/2012 **Evidentiary Hearing** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
09/05/2012 **Motion Hearing** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
09/05/2012 **Status Conference** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
09/27/2012 **Special Conference** (2:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held for Further Settlement
10/01/2012 **Special Conference** (4:00 PM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
10/01/2012 **Motion And/Or Praecipe Dismissed** (Judicial Officer: Sapala, Michael F.)
10/31/2012 **Evidentiary Hearing** (1:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
10/31/2012 **Status Conference** (1:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Held
10/31/2012 **Motion Hearing** (1:30 PM) (Judicial Officer Sapala, Michael F.)
Result: Reviewed by Court
10/31/2012 **Motion And/Or Praecipe Dismissed** (Judicial Officer: Sapala, Michael F.)
10/31/2012 **Miscellaneous Action** (Judicial Officer: Sapala, Michael F.)
03/04/2013 **Motion to Compel Action, Filed**
04/15/2013 **Appearance of Attorney, Filed**
04/15/2013 **Certificate of Mailing**
04/15/2013 **Answer to Motion, Filed**
04/18/2013 **Miscellaneous Response, Filed**
05/20/2013 **Notice of Presentment**
05/23/2013 **Miscellaneous Pleadings, Filed**
05/31/2013 **Miscellaneous Pleadings, Filed**
06/05/2013 **Notice of Presentment**
11/15/2013 **Brief in Support of Motion, Filed**
12/02/2013 **Notice of Hearing, Filed**
12/05/2013 **Notice of Hearing, Filed**
12/09/2013 **Answer to Motion, Filed**
12/09/2013 **Answer to Motion, Filed**
12/13/2013 **Appearance of Attorney, Filed**
12/17/2013 **Motion for Entry of Order, Filed**
12/17/2013 **Notice of Hearing, Filed**
12/20/2013 **Answer to Motion, Filed**
12/20/2013 **Brief in Support of Motion, Filed**
01/02/2014 **Answer to Motion, Filed**
03/03/2014 **Answer to Motion, Filed**
03/05/2014 **Miscellaneous Response, Filed**
03/10/2014 **Motion to Amend, Filed**
03/10/2014 **Brief in Support of Motion, Filed**
03/10/2014 **Notice of Hearing, Filed**
03/17/2014 **Proof of Subpoena Served, Filed**
03/18/2014 **Order for Miscellaneous Action, Signed and Filed** (Judicial Officer: Kenny, Timothy M.)
04/03/2014 **Proof of Service, Filed**
06/20/2014 **Miscellaneous Motion, Filed**
06/20/2014 **Miscellaneous Motion, Filed**
06/24/2014 **Notice of Hearing, Filed**
06/27/2014 **Miscellaneous Response, Filed**

05/29/2020 [Notice of Hearing, Filed](#)
 05/29/2020 [Exhibit, Filed](#)
 05/29/2020 [Proof of Service, Filed](#)
 05/29/2020 [Miscellaneous Motion, Filed](#)
 06/01/2020 [Praecipe, Filed](#) (Judicial Officer: Kenny, Timothy M.)
 06/01/2020 [Proof of Service, Filed](#)
 06/01/2020 [Exhibit, Filed](#)
 06/01/2020 [Proof of Service, Filed](#)
 06/02/2020 [Order Amending, File Supplemental Pleading, Signed and Filed](#)
 06/02/2020 [Appearance of Attorney, Filed](#)
 06/02/2020 [Proof of Service, Filed](#)
 06/02/2020 [Proof of Service, Filed](#)
 06/02/2020 [Appearance of Attorney, Filed](#)
 06/03/2020 [Reply to Brief, Filed](#)
 06/03/2020 [Proof of Service, Filed](#)
 06/04/2020 [Reply to Brief, Filed](#)
 06/04/2020 [Proof of Service, Filed](#)
 06/04/2020 [Proof of Service, Filed](#)
 06/04/2020 [Miscellaneous Motion, Filed](#)
 06/05/2020 [Proof of Service, Filed](#)
 06/05/2020 [Reply to Brief, Filed](#)
 06/05/2020 [Proof of Service, Filed](#)
 06/05/2020 [Miscellaneous Motion, Filed-WVD](#)
 06/08/2020 [Witness List, Filed](#)
 06/08/2020 [Proof of Service, Filed](#)
 06/08/2020 [Proof of Service, Filed](#)
 06/08/2020 [Witness List, Filed](#)
 06/08/2020 [Exhibit, Filed](#)
 06/08/2020 [Exhibit, Filed](#)
 06/08/2020 [Reply to Brief, Filed](#)
 06/08/2020 [Exhibit, Filed](#)
 06/08/2020 [Fee Waiver Request & Order, Signed and Filed](#)
 06/08/2020 [Exhibit, Filed](#)
 06/08/2020 [Exhibit, Filed](#)
 06/08/2020 [Exhibit, Filed](#)
 06/08/2020 [Proof of Service, Filed](#)
 06/09/2020 [Proof of Service, Filed](#)
 06/09/2020 [Miscellaneous Pleadings, Filed](#)
 06/11/2020 **Motion Hearing** (9:00 AM) (Judicial Officer Kenny, Timothy M.)
 06/05/2020 Reset by Court to 06/11/2020
 Result: Held
 06/11/2020 **Motion for Miscellaneous Action Granted, Order to Follow** (Judicial Officer: Kenny, Timothy M.)
 06/11/2020 [Exhibit, Filed](#)
 06/11/2020 [Exhibit, Filed](#)
 06/11/2020 [Reply to Brief, Filed](#)
 06/11/2020 [Proof of Service, Filed](#)
 06/11/2020 [Proof of Service, Filed](#)
 06/11/2020 [Miscellaneous Motion, Filed](#)
 06/11/2020 [Exhibit, Filed](#)
 06/11/2020 [Proof of Service, Filed](#)
 06/12/2020 **Motion Hearing** (10:00 AM) (Judicial Officer Kenny, Timothy M.)
 Result: Held
 06/12/2020 **Motion for Miscellaneous Action Granted, Order to Follow** (Judicial Officer: Kenny, Timothy M.)
 06/12/2020 [Proof of Service, Filed](#)
 06/12/2020 [Miscellaneous Motion, Filed](#)
 06/12/2020 [Exhibit, Filed](#)
 06/12/2020 [Reply to Brief, Filed](#)
 06/12/2020 [Proof of Service, Filed](#)
 06/12/2020 [Exhibit, Filed](#)
 06/12/2020 [Exhibit, Filed](#)
 06/12/2020 [Exhibit, Filed](#)
 06/12/2020 [Exhibit, Filed](#)
 06/12/2020 [Proof of Service, Filed](#)
 06/12/2020 [Exhibit, Filed](#)
 06/12/2020 [Exhibit, Filed](#)
 06/15/2020 [Proof of Service, Filed](#)
 06/15/2020 [Miscellaneous Motion, Filed](#)
 06/15/2020 [Miscellaneous Motion, Filed](#)
 06/16/2020 [Proof of Service, Filed](#)
 06/16/2020 [Miscellaneous Motion, Filed-WVD](#)
 06/16/2020 [Proof of Service, Filed](#)
 06/16/2020 [Reply to Brief, Filed](#)
 06/16/2020 [Opinion of Court, Signed and Filed](#) (Judicial Officer: Kenny, Timothy M.)
 06/16/2020 [Opinion of Court, Signed and Filed](#) (Judicial Officer: Kenny, Timothy M.)
 06/17/2020 [Order for Miscellaneous Action, Signed and Filed](#)
 06/17/2020 [Miscellaneous Pleadings, Filed](#)
 06/17/2020 [Proof of Service, Filed](#)
 06/19/2020 [Opinion of Court, Signed and Filed](#)

	Defendant WAYNE COUNTY SHERIFF			
	Total Financial Assessment			20.00
	Total Payments and Credits			20.00
	Balance Due as of 07/02/2020			0.00
02/17/2015	Transaction Assessment			20.00
02/17/2015	Civil File & Serve Payment	Receipt # 2015-13619	WAYNE COUNTY SHERIFF	(20.00)
	Intervening Party Local 3317 AFSCME Council 25			
	Total Financial Assessment			20.00
	Total Payments and Credits			20.00
	Balance Due as of 07/02/2020			0.00
11/14/2014	Transaction Assessment			20.00
11/14/2014	Civil File & Serve Payment	Receipt # 2014-27162	Local 3317 AFSCME Council 25	(20.00)
	Plaintiff WAYNE COUNTY JAIL INMATES			
	Total Financial Assessment			140.00
	Total Payments and Credits			140.00
	Balance Due as of 07/02/2020			0.00
05/29/2020	Transaction Assessment			20.00
05/29/2020	eFiling	Receipt # 2020-36391	Allison Kriger	(20.00)
06/02/2020	Transaction Assessment			20.00
06/02/2020	eFiling	Receipt # 2020-36916	Allison Kriger	(20.00)
06/05/2020	Transaction Assessment			20.00
06/05/2020	eFiling	Receipt # 2020-37861	Allison Kriger	(20.00)
06/12/2020	Transaction Assessment			20.00
06/12/2020	eFiling	Receipt # 2020-39246	Allison Kriger	(20.00)
06/15/2020	Transaction Assessment			20.00
06/15/2020	eFiling	Receipt # 2020-39283	Allison Kriger	(20.00)
06/15/2020	Transaction Assessment			20.00
06/15/2020	eFiling	Receipt # 2020-39516	Allison Kriger	(20.00)
06/15/2020	Transaction Assessment			20.00
06/15/2020	eFiling	Receipt # 2020-39526	Allison Kriger	(20.00)