Case 4:19-cv-00226 Document 284 Filed	1 011 09/16/20 IN TXSD Page 1 01 13
	States District authern District istan Division
	United States Courts Southern District of Texas FILED
Dwight Russell, et al.,	SEP 1 6 2020
Plaintiff's,	David J. Bradley, Clerk of Cour
√s.	Case No. 4:19-cv-00226
Harris County, Texas, et al.)	(Class Action) The Honorable Lee H. Rosenthal Chief United States District
	Judge
Plaintiff's Emergency Mi	stion to Compel Injunctive
Relief Due to the Interioral	and Wanton Infliction of
Pain and Suffering in Vic	lation of the 8th and 4th
Amendments to the U.S.C	onstitution and the Amex-
ican's with Disabilities Ac	f of 1990 and Amendments
Act of	2009
ES0085-01-07	

To the Honorade Lee H. Rosenthal, Chief United States District Judge, Presiding:
Now Comes, Devin Paul Cole, Plaintiff, incar- cerated pre-trial detainer in the dangerous, God for- saken, inhumane, unsanitary and unconstitutional Harris County Jail and tikes this his Emergency Motion to Compel Injunctive Keliefietc., with the Court, for the reasons set forth below:
to Contidentially, Contidentiality Laws under HIPPA etc. I want-this Court and Plaintitt's Attorneys to have unlimited immediate access to all of my Medical
Kecords.
I am requesting that Ms. R. Hill, LUW, Medical Grievance Investigator Dr. Laxman Synders, M.D., Medical Director, and Dr. or Physician Assistant, Gaston Cassillas all be added to this lawsuit for Falsitying Death Certificate and Autopsy Report Intormation and Entering False, Incorrect and writtee information relating

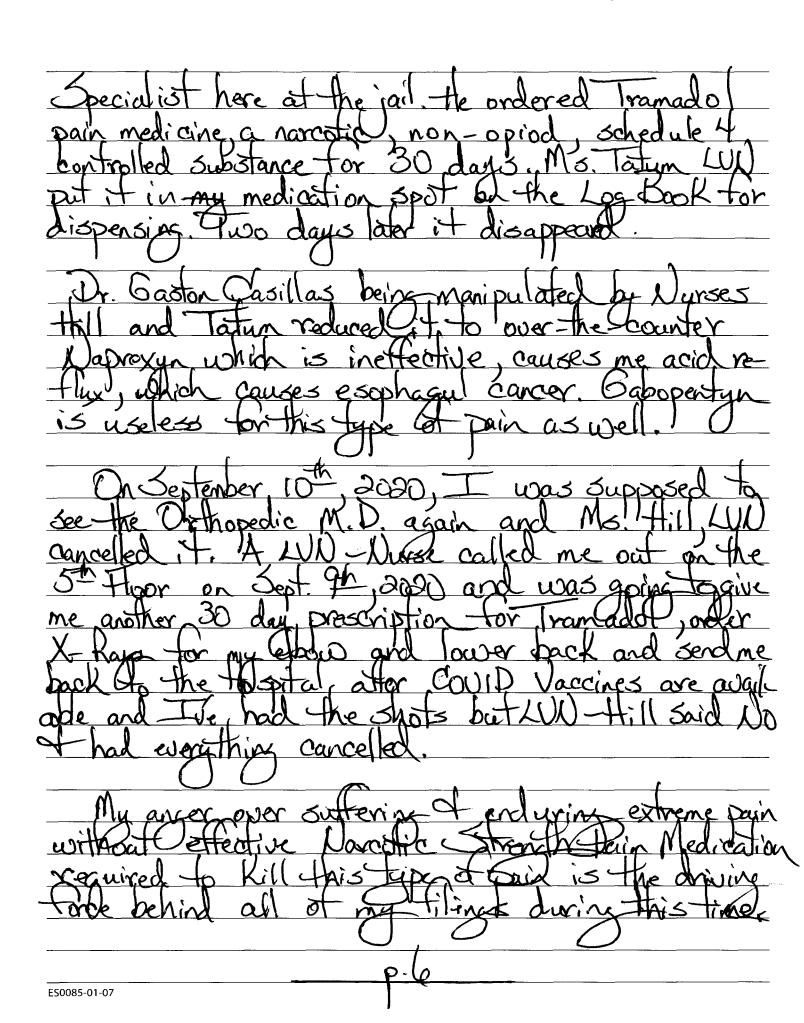
ES0085-01-07

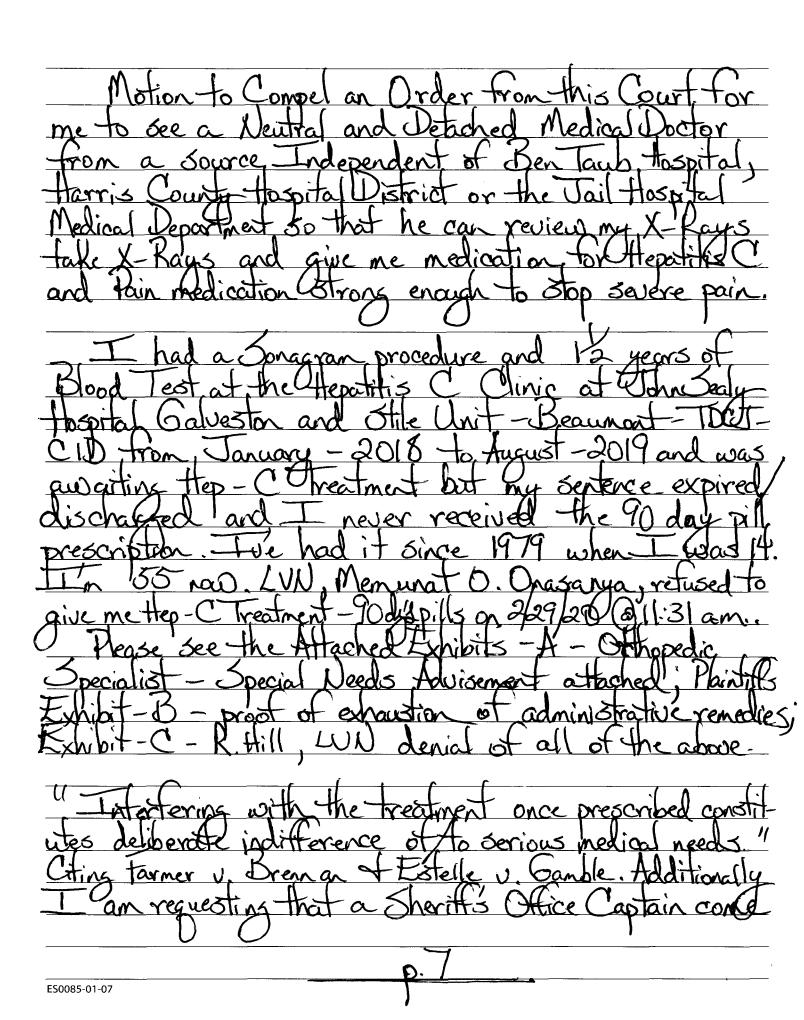
to innates received in the intirmary with tever couning breathing trouble, heart trouble broken bones, tracture of bones, cancer, and other serious medical ailments," and deleting erasing and attering computer information on medical department Computers regarding compaint and medical care and denial of Naxofic Otrensth tain Medication to inmates with Deixures, tepatitis C, Substance Abuse History, Mental Health History in violation of the Americans with Disabilities to at 1990 and Amendments Act of 2009.
On 2-29-2020 I verballer requested the new oral 90 days tablet presention to cure theratitis C. The Vicerian LUD & trovider) and Ms. R. Hill denied my request. They retused to give me the 90 day prescription to cure theratitis C. I made the request again and Dr. Laxman Surders, M.D. and Medical Wireston and Dr. Gaston Capillas, P.A. / M.D. both denied the patritis C treatment.
On 6-13-2020 I slipped and tell on a wet floor in the pail and proke my middle (3rd) finger on my right hand completely through I through I through I the ligament tendon's tore off the bone completely.
p .3

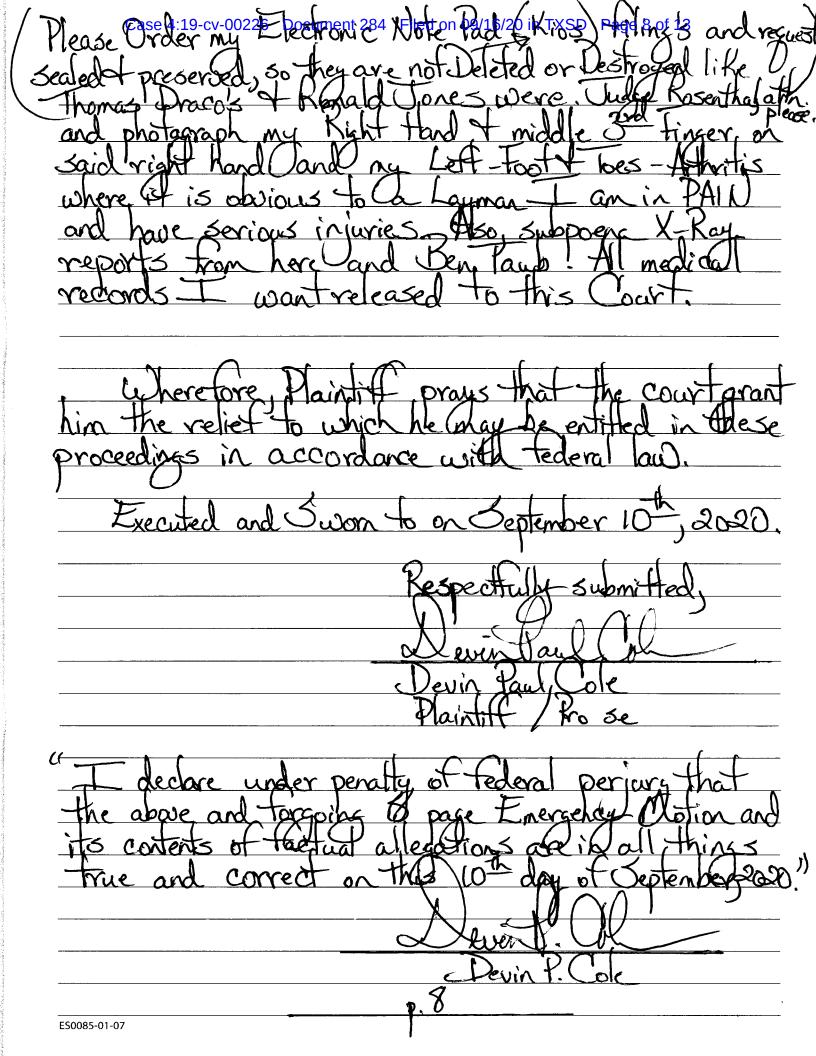
ES0085-01-07

Ir an right handed, my abilities related to the use
of my right hand in lifes daily activities, have been impaired substantially. To make matters woose.
impaired substantially To make matters worse.
have been denied effective Norcotic Strength Pain Med- igation since I was injured. I amin pain all
the time. My finger is ruined, permanently distigued
At that time my Left Elban was tractured and my lower back began causing me a great deal of bain.
Ive asked for X-Rays and they will not even
Ive asked for X-Rays and they will not even X-Ray my Left-Eloob and Lower Back.
On 6-14-20 I was sent to the Ben Taylo Hospital.
While there Doctors X-Rayed my hand, shot injected
While there Doctors X-Rajed my hand, shot/injected Novacaine into my finger, gave me 10 mg. Norco-tydro-
codone tain killers, corapped my hand and entire orm
up in a Spirit Bardage Tape and set a date for surgery 10 days later. They sent Novco Hydrocodone fain Killer
Orders back with me to be given every 4 hours for
pain. Once I got back they cut the prescriptions in
hatt and then cut then lott completely.
On 6-22-20 I returned to Ben Taylo. They were
going to admit me for surgery Decause at so many
operation. When I got back on the morning of
of state of
ES0085-01-07

the 23rd, June, 2020, they forced me to sign a return
I retused to sign, a vetusal at first and then guards
(sheriff's dept deputies) Surrounded me and threatened
to put me in a holding tank with newly arrived in- mates tresh off the streets At that time I under
physical coercion signed the vetusal and wrote Corona-
orras - COVID-1900" Medical Malpractice, etc. on the
going to keep me in the jail intigmary medical cells once
I returned from the hospital it I had surgery where
all the sick inmates are Again, I am not going to
The pail on the 1st Hoon on Den Taub. The lessen
of D evils, Dain and Suffering (tinser distingure ment)
or DEATH Dying from (COUID-198) Corobavirus. I chose to stay alive with a broken fixor.
()
On June 30th, 2000 I read where Mr. Sugman
Attorney @ Law of tounder of Ousman & Godfrey
after receiving intensive core at a Texas Medical Enter
Hospital Herman or Methodist) and Subsequently died.
the was a healthy man and a Legal Genuis. My
Tears were not untolended.
On 8-11-2020 I saw a Orthopedic M.D.,
-5
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Harris County Sheriff's Office Health Services 1200 Baker St., Houston, TX 77002

August 11, 2020 Special Needs Advisement

COLE. DEVIN PAUL

JA09 5H1

DOB: 07/13/1965 **SEX:** Male

Date Issued: 08/11/2020

Provider ID: 1790013586007050

Location of Care: Health Services (JA09)

HCSO Special Needs Advisement

To the Watch Commander:

This Patient has a medical problem which would benefit from.

Other Company of the Company of the

For

Comments: END DATE: 22 SEPTEMBER 2020

This medical problem will be re-evaluated as needed. Please notify Health Services immediately of any

concerns.

Electronically Signed on 08/11/2020 at 7:09PM

On 8-18.20 LN - Retill

Dr. Gaston LNN laturaged tion the Order

and LNN laturaged Transadol & 2x's Day

concern transadol reservition the Order

to 3D dys. Torn ligament

tendon from finger bone &

broken finger X-Ray

8/11/20

INMATE GRIEVANCE BOARD

GRIEVANCE RECEIPT

TO: INMATE COLE

DEVIN PAUL

SPN# 2145549

Cell Block: 5H1 05I

This is your notification, as required by the Texas Commission on Jail Standards that your grievance was received on 8/28/2020 and filed as grievance # 35544 This grievance is in reference to MEDICAL SERVICES

At this time, your grievance is under investigation.

Please do not file any further grievances in reference to this matter.

Grievance Board Member BDSHELTON

8/28/2020

Plaintiff's Exhibit B

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INMATE GRIEVANCE BOARD

1200

To:

DEVIN PAUL

COLE

Grievance Received

8/28/2020

SPN# 2145549

From: Inmate Grievance Board

Ref: GRIEVANCE #

35544

MEDICAL SERVICES

In 15 grs as Medical Grievance Investigator LVN R. Hill determined every single inmolegrievance

The Inmate Grievance Board has received a grievance from Inmate-

DEVIN PAUL

COLE

Upon completion of your investigation, check the appropriate finding and provide the Inmate with this Grievance Receipt.

I have investigated this grievance and determined it to be:

Unfounded

Founded/Resolved

Founded/Unresolved

OIG/IAD or Bureau Investigation

Jamis (

Grievance Receipt **Inmate Copy**

Grievances with an Unfounded or Founded/Resolved determination may be appealed to the Grievance Board. Appeals must be in writing and submitted within (5) five working days of the investigating supervisor's decision (excluding holidays).

Grievance Receipt was Delivered to Inmate

COLE

on Date: 4/9/2020

Supervisor's printed name:

Supervisor's Signature:

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	SEP 1 6 2020
	September 10th, 2020 David J. Bradley, Clark of Cour
()	Dear Mr. David J. Bradley Clerk,
	Please find enclosed my Emercency. Fro Se Motion torbe filed with your office, and Chief Judge Rosenthal's count in accordant with Federal Law.
	Thank you. Very truly 10000,
	Russell us. Harris Courty, Ix. Plaintiff Case No. 4:19-cu-002265 Pro Se Title 42 USC \$ 1983
7	Devin P. Cole - Plaintiff
	SPNHO2145549 Harris Count Jail 1200 Baker St. Houston, Ix. 77002

HARRIS COUNTY SHERIFF'S OFFICE J	AIL	U.S. POSTAGE
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SPN: 02145549 Cell: 5-4-1 Street 1200 Daker Creet		ZIP 77002 \$
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V	Mr. David J. Br	adley Clerk
	United Het De	to t
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THE DIGENT	Southern District,	of, lexas
FEDERAL/LEGAL	P.O. Box 61010	, Houston, Texas
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