

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

EDWARD BRAGGS, et al.)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION NO.
)	2:14-cv-00601-MHT-JTA
JOHN Q. HAMM, in his official)	Judge Myron H. Thompson
capacity as Commissioner of the)	
Alabama Department of Corrections,)	
et al.)	
)	
Defendants.)	

**PLAINTIFFS’ REPORT ON WHAT THE MOST RECENT
MENTAL HEALTH STAFFING REPORTS REFLECT**

Pursuant to this Court’s July 20, 2022 Scheduling Order (Doc. 3667), Plaintiffs hereby submit this report about “what the most recent quarterly mental-health staffing reports to the court reflect.” Plaintiffs have reviewed mental health staffing reports covering the time between January 1, 2021, and March 31, 2022. This analysis will allow the Court to see what, if any, changes have occurred since the timeframe immediately preceding the Omnibus Remedial Hearing.

As this Court noted in Part II of its Omnibus Remedial Opinion, the fact that, at that time, “several ADOC facilities may have enough mental-health staff to serve their current populations [wa]s an encouraging development, but not necessarily a permanent one.” Doc. 3462 at 87-88. The effects of ADOC halting intakes during the

COVID-19 pandemic were obvious then. However, the population within ADOC has increased substantially and rapidly, as the parties had predicted it would once ADOC resumed its normal rate of intakes. *See id.* at 88. In May 2021, at the beginning of the Omnibus Remedial Hearing, ADOC reported 16,792 individuals in its facilities,¹ which is the lowest number of individuals in ADOC custody in recent years. A year later, in May 2022, ADOC reported 3,083 more people in its custody, equating to 19,875² total individuals in ADOC custody. In May 2020, when intake slowed because of COVID, the in-house population of ADOC's facilities was 20,170³ total individuals, a difference of less than 1.5% from 2022.

The low population at the time of the Omnibus Remedial Hearing, along with its potential impact on ensuring adequate mental health staffing, is no longer a reality inside ADOC. This fact, combined with the extremely low correctional staffing numbers, complicates any analysis of adequacy of mental health staffing, in part because the mental health staffing ratios, which established the baseline numbers in the staffing matrix when applied to 2019 populations, assume adequate correctional staffing. *See* Doc. 3462 at 89.

Although the Court ordered ADOC to provide updated mental health staffing ratios by January 15, 2020, (*see Braggs v. Dunn*, 2:14-cv-601-MHT, 2018 WL

¹ <http://doc.alabama.gov/docs/MonthlyRpts/May%202021.pdf>

² <http://doc.alabama.gov/docs/MonthlyRpts/May%202022.pdf>

³ <http://doc.alabama.gov/docs/MonthlyRpts/May%202020.pdf>

7106346, at *5-6 (M.D. Ala. Feb. 20, 2018), ADOC failed to do so. Plaintiffs therefore rely on the staffing matrix, which is based on ADOC's 2019 population, to analyze the adequacy of current mental health staffing. When the staffing matrix was completed in September 2019, ADOC reported 20,953 individuals in its facilities,⁴ which is only a difference of 1,078 individuals compared to May 2022.

A review of the Quarterly Mental Health Staffing Reports makes it clear that ADOC is having persistent problems in at least a few areas. First, staffing for certain positions has been, and remains, low throughout the department. Second, while different facilities have varying levels of mental health staff, no facility has adequate mental health staffing. Third, staffing coverage in some facilities has decreased since March 2021, indicating a concerning backslide from progress already made. Coupled with a continued deterioration in correctional officer staffing (*see* Plaintiffs' August 5, 2022 Analysis of Quarterly Staffing Report, filed under seal), the situation is getting worse, not better.

I. LOW STAFFING IN TARGET POSITIONS

Some positions, especially those responsible for providing direct care to patients needing mental health treatment, have low staffing across all ADOC facilities. Plaintiffs' analysis focuses on five positions with low staffing, all of which are

⁴<http://doc.alabama.gov/docs/MonthlyRpts/DMR%2009%20September%202019PUB.pdf>

responsible for providing direct care: Activity Technicians, Certified Registered Nurse Practitioners (CRNPs), Registered Nurses (RNs), Licensed Mental Health Professionals (MHPs), and Psychologists.

Activity Technicians are responsible for conducting mental health related groups in Residential Treatment Units (RTUs). As shown below in Table 1, Bullock and Donaldson both require the largest number of Activity Technicians, which aligns with the number of RTU beds. Bullock, Donaldson, and Tutwiler all show a deficiency in Activity Technicians that has been present over multiple previous quarters. These numbers indicate there likely are not enough Activity Technicians, based on the staffing matrix, to provide classes to patients in these facilities.

Table 1.	Activity Technicians, hours worked per quarter					
	Contract FTEs	1.21 – 3.21 ⁵	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Bullock	15.53	30.79% ⁶	40.96%	64.34%	85.07%	67.86%

⁵ Throughout this filing, “1.21-3.21” is used to as a reference to the staffing numbers included in Doc. 3227-1. “4.21-6.21” is used as a reference to the staffing numbers from Doc. 3397-1. “7.21-9.21” is used as a reference to the staffing numbers from Doc. 3436-1. “10.21-12.21” is used as a reference to the staffing numbers from Doc. 3525-1. “1.22-3.22” is used as a reference to the staffing numbers from Doc. 3617-1.

⁶ The percentages used throughout this report reflect the “Hours Actually Worked” on each of the Quarterly Mental Health Staffing Reports, divided by the “Total FTEs in Quarterly Hours” for each position. Plaintiffs use this to determine how many hours each position at each facility actually worked. This differs from Defendants’ “Fill Rate,” as the fill rate determines when the positions are subject to payback. “Fill Rate” is useful to determine contract compliance, but it does not necessarily reflect whether adequate staffing is provided to meet constitutional minimums. Plaintiffs contend that a percentage less than 85% shows staffing below that anticipated by the Staffing Matrix.

Donaldson	13.26	20.52%	24.92%	53.05%	64.77%	61.26%
Kilby	1.87	4.39%	67.51%	107.56%	94.01%	93.11%
Tutwiler	3.2	28.44%	62.62%	99.34%	78.33%	56.08%

CRNPs work with Psychiatrists in collaborative agreements to prescribe mental health medications to individuals in need. *See generally* Ala. Code § 34-21-1 *et seq.* As reflected in Table 2 below, Bibb, Easterling, Fountain, St. Clair, and Tutwiler have persistent understaffing of CRNPs, although every facility except for the outpatient portion of Bullock have struggled to ensure adequate CRNP coverage since January 2021.

Table 2.	CRNPs, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Bibb	0.8	29.39%	31.07%	30.74%	10.38%	25.00%
Bullock	2.12	85.00%	85.00%	85.00%	85.00%	85.00%
Bullock - Outpatient	1	85.00%	85.00%	85.00%	85.00%	85.00%
Donaldson	1.6	48.13%	50.21%	57.27%	67.09%	85.00%
Donaldson - Outpatient	1.1	79.97%	80.16%	78.99%	73.13%	85.00%
Easterling	1.1	39.60%	40.17%	50.19%	46.27%	53.49%
Fountain	1	10.95%	8.23%	9.53%	0.00%	7.25%
Holman	1	9.37%	85.00%	85.00%	0.00%	6.53%
Kilby	0.99	85.00%	85.00%	60.60%	67.05%	85.00%
Kilby CSU	0.25	25.51%	85.00%	85.00%	0.00%	85.00%
Limestone	1	83.22%	38.08%	77.75%	85.00%	85.00%
St. Clair	0.5	88.57%	40.38%	34.09%	38.16%	0.00%
Staton	1	85.00%	80.38%	83.28%	85.00%	85.00%
Tutwiler	1.15	79.96%	78.63%	82.55%	69.09%	74.19%
Tutwiler Outpatient	1.05	0.00%	0.00%	0.00%	0.00%	0.00%
Ventress	0.5	85.00%	81.92%	85.00%	53.98%	85.00%

RNs administer medication, triage mental health referrals, conduct intake and restrictive housing evaluations, and supervise work conducted by Licensed Practical Nurses. As reflected in Table 3, very few facilities have adequate RN staffing based on the staffing matrix. Bibb, Fountain, and Hamilton A&I have been without RNs for an extended period. For the mental health hubs—Bullock, Donaldson, and Tutwiler—it is possible that the RNs responsible for working with the mental health units can assist in covering the needs of the outpatient portion of the facility; however, these facilities each show low RN staffing for both the outpatient and mental health positions, as well throughout the entire facility.

Table 3.	RNs, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Bibb	1.2	0.00%	0.00%	0.00%	0.00%	0.00%
Bullock	9.43	30.87%	28.21%	35.90%	23.69%	31.19%
Bullock - Outpatient	1.4	85.00%	85.00%	85.00%	27.69%	0.00%
Donaldson	4.2	66.05%	65.51%	54.78%	84.01%	85.00%
Donaldson - Outpatient	1	33.54%	1.92%	1.61%	1.70%	69.61%
Easterling	1.2	72.47%	66.67%	71.54%	76.23%	82.68%
Fountain	1.2	0.00%	0.00%	0.00%	0.00%	0.00%
Hamilton A&I	0.6	0.00%	0.00%	0.00%	14.32%	0.00%
Holman	0.6	0.00%	24.74%	0.00%	0.00%	0.00%
Kilby	2.12	17.62%	34.36%	62.95%	16.13%	15.59%
Kilby CSU	7.74	18.13%	38.15%	40.86%	16.12%	17.64%
Limestone	1.2	68.93%	84.86%	83.73%	85.00%	85.00%
St. Clair	0.6	85.00%	96.88%	85.00%	85.00%	85.00%
Staton	1.5	71.88%	28.14%	55.18%	59.68%	27.35%
Tutwiler	4.2	58.13%	34.05%	80.41%	71.36%	34.08%

Tutwiler Outpatient	1.2	0.00%	0.00%	0.00%	5.95%	0.00%
Ventress	1.2	79.41%	82.05%	78.67%	100% ⁷	85.00%

Licensed MHPs are responsible for providing counseling and caseload management for all patients receiving mental health treatment within ADOC. As Table 4 shows, this position also remains *extremely* understaffed at every facility except for Limestone, which reported almost 85% of the quarterly hours being worked. Some facilities, including Hamilton A&I, Bullock’s mental health unit, Easterling, and Tutwiler, have *less than 25%* of the hours for each quarter covered. If patients at those facilities are receiving counseling, the ratio of MHPs to patients likely results in extremely high caseload numbers.

Table 4.	MHPs, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Bibb	4.97	35.04%	38.75%	25.45%	30.13%	50.71%
Bullock	13.88	20.32%	34.25%	33.96%	16.63%	14.18%
Bullock - Outpatient	5.4	55.64%	39.70%	11.90%	8.34%	0.56%
Donaldson	16.62	35.11%	31.82%	27.93%	30.60%	26.26%
Donaldson - Outpatient	2.8	84.58%	76.21%	36.57%	32.67%	30.42%
Easterling	4.91	38.84%	46.68%	32.85%	13.80%	17.58%
Fountain	4.59	24.24%	23.47%	35.02%	30.86%	33.98%
Hamilton A&I	1.58	62.38%	27.66%	4.22%	0.42%	4.70%
Holman	5.07	20.51%	22.81%	3.36%	0.90%	17.93%
Kilby	8.6	39.89%	33.64%	19.40%	28.15%	29.20%
Kilby CSU	4.99	33.32%	21.54%	20.38%	16.02%	14.78%

⁷ Percentages over 100% were reduced to 100% in every table except for Table 6.

Limestone	8.17	51.84%	75.91%	77.17%	88.11%	84.96%
St. Clair	4.64	37.56%	43.87%	33.91%	56.43%	57.66%
Staton	6.39	61.03%	63.29%	64.55%	62.31%	55.15%
Tutwiler	9.3	47.59%	54.10%	38.42%	31.99%	23.00%
Ventress	4.43	36.12%	24.05%	24.59%	20.39%	24.97%

Psychologists are responsible for conducting psychological tests and working in inpatient settings to assist with direct treatment, counseling, and supervision of MHPs. As Table 5 demonstrates, this position is either understaffed or completely unfilled throughout ADOC. For example, Bullock, which is a mental health hub, does not currently have a psychologist, nor has it had a psychologist since early 2021.

Table 5.	Psychologists, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Bullock	2.5	13.96%	0.00%	0.00%	0.00%	0.00%
Donaldson	2.2	45.21%	52.49%	50.92%	43.78%	37.33%
Kilby	2.2	67.27%	62.72%	74.10%	74.77%	82.85%
Kilby CSU	1.1	0.00%	0.00%	0.00%	0.00%	0.00%
Tutwiler	1	85.00%	85.00%	54.70%	51.33%	74.61%
Tutwiler - Outpatient	2.2	47.23%	42.55%	42.67%	13.77%	7.99%

By pointing to the understaffing of these positions, Plaintiffs do not mean to suggest that all other positions are sufficiently staffed. To the contrary, ADOC continuously reports that every position except for Mental Health Observers has less than 85% coverage for quarterly hours.

Not only do the percentages under 85% indicate a lack of compliance with the

Staffing Matrix, percentages well over 100% indicate areas where ADOC provides excessive staffing. As Table 6 shows, ADOC frequently staffs Mental Health Observers over 100%. This overstaffing may illustrate a high crisis cell usage.

Table 6.	Mental Health Observers, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Bibb	2	159.52%	122.84%	138.71%	154.17%	115.48%
Bullock	6	210.03%	218.27%	204.60%	213.44%	208.50%
Donaldson	8	129.69%	98.11%	75.63%	106.34%	114.42%
Holman	5	157.55%	171.61%	154.02%	145.38%	128.21%
Kilby	6	277.47%	256.64%	268.06%	302.53%	308.97%
Limestone	3	132.33%	129.55%	138.53%	111.38%	136.57%

II. STAFFING DIFFICULTIES AT THE MENTAL HEALTH HUBS

Although all facilities have difficulties staffing mental health positions, the mental health hubs⁸—Bullock, Donaldson, and Tutwiler—have persistent staffing issues this Court should not ignore.

Table 7.	Bullock, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Administrative Assistant	2	47.24%	90.87%	93.20%	85.00%	80.31%
Activity Tech	15.53	30.79%	40.96%	64.34%	85.07%	67.86%
ADON	1	0.00%	0.00%	0.00%	42.28%	85.00%
MH Clerk	2.2	86.54%	80.51%	85.00%	82.01%	85.00%

⁸ Bullock, Donaldson, and Tutwiler each have two entries in the Staffing Report: one that is explicitly “outpatient” and one that is not. This implies that the staffing matrix for the non-outpatient staff refers to the staff assigned to the RTU/SU. The tables within this section reflect data taken from the non-outpatient positions.

CRNP	2.12	85.00%	85.00%	85.00%	85.00%	85.00%
LPN	16.48	55.70%	50.20%	39.59%	37.37%	35.37%
Observer	6	100%	100%	100%	100%	100%
RN	9.43	30.87%	28.21%	35.90%	23.69%	31.19%
RTU/SU Coordinator	1	81.64%	77.12%	85.00%	85.00%	75.34%
Site Program Manager	1	85.00%	85.00%	85.00%	85.00%	85.00%
MHP Licensed	13.88	20.32%	34.25%	33.96%	16.63%	14.18%
Psychiatrist	2	85.00%	85.00%	85.00%	69.09%	85.00%
Psychologist PhD	2.5	13.96%	0.00%	0.00%	0.00%	0.00%

Table 8.	Donaldson, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Activity Tech	13.26	20.52%	24.92%	53.05%	64.77%	61.26%
ADON	1	0.00%	0.00%	0.00%	85.00%	85.00%
Clerk	2.2	42.66%	81.62%	65.96%	66.18%	81.68%
CRNP	1.6	48.13%	50.21%	57.27%	67.09%	85.00%
LPN	11.82	70.93%	58.11%	52.50%	47.83%	48.30%
Observer	8	100%	98.11%	75.63%	100%	100%
RN	4.2	66.05%	65.51%	54.78%	84.01%	85.00%
Site Program Manager	1	85.00%	83.30%	85.00%	83.48%	85.00%
MHP Licensed	16.62	35.11%	31.82%	27.93%	30.60%	26.26%
Psychiatrist	1	85.00%	85.00%	85.00%	85.00%	85.00%
Psychologist PhD	2.2	45.21%	52.49%	50.92%	43.78%	37.33%

Table 9.	Tutwiler, hours worked per quarter					
	Contract FTEs	1.21 – 3.21	4.21 – 6.21	7.21 – 9.21	10.21- 12.21	1.22- 3.22
Activity Tech	3.2	28.44%	62.62%	99.34%	78.33%	56.08%
ADON	1	76.46%	85.00%	85.00%	77.32%	67.58%
Clerk	3.9	86.21%	95.60%	84.78%	61.67%	68.16%
CRNP	1.15	79.96%	78.63%	82.55%	69.09%	74.19%
LPN	7.5	42.58%	49.99%	62.50%	55.27%	55.38%

RN	4.2	58.13%	34.05%	80.41%	71.36%	34.08%
Site Program Manager	2.2	37.38%	78.80%	63.15%	71.23%	85.00%
MHP Licensed	9.3	47.59%	54.10%	38.42%	31.99%	23.00%
Psychiatrist	1.1	85.00%	85.00%	85.00%	100%	85.00%
Psychologist PhD	1	85.00%	85.00%	54.70%	51.33%	74.61%

III. STAFFING DECREASES AND CENTRAL OFFICE VACANCIES

When comparing the percentage of hours covered between January 2022 through March 2022 to the hours covered between January 2021 through March 2021, some positions have decreased their staffing, while others have shown no improvement over the previous quarters. Seventeen positions have more than a 25% decrease in hours filled over this period. Only those positions falling below 85% between January 2022 and March 2022 are included in Table 10.

Table 10.		Decreasing Coverage Comparing January – March 2021 to January – March 2022			
		Contract FTEs	1.21-3.21	1.22-3.22	Difference
Kilby CSU	LPN	4.20	85.00%	56.55%	-28.45%
Kilby CSU	Clerk	1.10	85.00%	55.17%	-29.83%
Hamilton A&I	LPN	1.04	87.28%	48.73%	-38.55%
Tutwiler - Outpatient	Psychologist PhD	2.20	47.23%	7.99%	-39.24%
Staton	RN	1.50	71.88%	27.35%	-44.52%
Donaldson - Outpatient	MHP Licensed	2.80	84.58%	30.42%	-54.16%
Bullock - Outpatient	MHP Licensed	5.40	55.64%	0.56%	-55.07%
Hamilton A&I	MHP Licensed	1.58	62.38%	4.70%	-57.68%

Central Office	Data Reports Manager	1.00	104.15%	40.33%	-63.82%
Donaldson-Outpatient	MH LPN	1.40	85.00%	19.98%	-65.02%
Bullock - Outpatient	MH LPN	1.40	69.61%	0.00%	-69.61%
Donaldson-Outpatient	MH Clerk	1.00	79.93%	0.00%	-79.93%
Bullock - Outpatient	MH RN	1.40	85.00%	0.00%	-85.00%
St. Clair	MH CRNP	0.50	88.57%	0.00%	-88.57%
Fountain	MH LPN	1.00	115.38%	0.00%	-115.38%

ADOC is even struggling to staff some central office positions. For instance, throughout the entire timeframe evaluated in this report, the regional psychologist position, consisting of 2.4 FTEs, has never been covered for more than 18.07% of the hours for the entire quarter.

CONCLUSION

Since this Court issued its Liability Opinion in June 2017 and found ADOC's provision of mental health care to be "horrendously inadequate" (*Braggs v. Dunn*, 257 F. Supp. 3d 1171, 1267 (M.D. Ala. 2017)), little has changed in terms of ADOC's ability to recruit and maintain mental health staff necessary to support a constitutionally adequate system.

Dated: August 5, 2022

Respectfully Submitted,

/s/ Ashley N. Light

Ashley N. Light

AL. Bar No. 1059F69L

One of the Attorneys for Plaintiffs

Ashley N. Light
Lisa W. Borden
Susanne Cordner*

SOUTHERN POVERTY LAW CENTER

400 Washington Avenue
Montgomery, AL 36104
Telephone: (334) 956-8200
Facsimile: (334) 956-8481
ashley.light@splcenter.org
lisa.borden@splcenter.org
susanne.cordner@splcenter.org
**Admitted pro hac vice*

Leslie Faith Jones*

SOUTHERN POVERTY LAW CENTER

111 East Capitol Street, Suite 280
Jackson, MS 39201
Telephone: (601) 948-8882
Facsimile: (334) 956-8281
leslie.jones@splcenter.org
**Admitted pro hac vice*

Bruce Hamilton*

SOUTHERN POVERTY LAW CENTER

201 St. Charles Avenue
Suite 2000
New Orleans, LA 70170
Telephone: (504) 352-4398
Facsimile: (504) 809-7899
**Admitted pro hac vice*

William G. Somerville, III

Patricia Clotfelter

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ PC**

420 20th Street North, Suite 1400
Birmingham, AL 35203
wsomerville@bakerdonelson.com
pclotfelter@bakerdonelson.com

William Van Der Pol, Jr.
Lonnie Williams
Barbara A. Lawrence
Andrea J. Mixson

**ALABAMA DISABILITIES
ADVOCACY PROGRAM**

University of Alabama
500 Martha Parham West
Box 870395
Tuscaloosa, AL 35487
Telephone: (205) 348-4928
Facsimile: (205) 348-3909
wvanderpoljr@adap.ua.edu
lwilliams@adap.ua.edu
blawrence@adap.ua.edu
amixson@adap.ua.edu

Catherine E. Stetson*
Neal K. Katyal*
Jo-Ann T. Sagar*

HOGAN LOVELLS US LLP

555 Thirteenth Street, NW
Washington, DC 20004
Telephone: (202) 637-5600
Facsimile: (202) 637-5910
cate.stetson@hoganlovells.com
neal.katyal@hoganlovells.com
jo-ann.sagar@hoganlovells.com
**Admitted pro hac vice*

Mark Whitburn*

WHITBURN & PEVSNER, PLLC

2000 East Lamar Boulevard, Suite #600
Arlington, TX 76006
Telephone: (817) 672-5453
Facsimile: (817) 653-4477
mwhitburn@whitburnpevsner.com
**Admitted pro hac vice*

Joshua C. Toll*

KING & SPALDING LLP

1700 Pennsylvania Avenue NW, 2nd Floor

Washington, DC 20006-4707

Telephone: (202) 227-6138

Fascimile: (202) 626-3737

jtoll@kslaw.com

**Admitted pro hac vice*

Evan Diamond*

KING & SPALDING LLP

185 Avenue of the Americas, 34th Floor

New York, NY 10036

Telephone: (212) 556-2297

Fascimile: (212) 556-2222

ediamond@kslaw.com

**Admitted pro hac vice*

Edward A. Bedard*

KING & SPALDING LLP

1180 Peachtree Street NE, Suite 1600

Atlanta, GA 30309

Telephone: (404) 572-3127

Fascimile: (404) 572-5100

ebedard@kslaw.com

**Admitted pro hac vice*

Rachel Rubens*

KING & SPALDING LLP

50 California Street, Suite 3300

San Francisco, CA 94111

Telephone: (415) 318-1210

rrubens@kslaw.com

**Admitted pro hac vice*

ATTORNEYS FOR THE PLAINTIFFS

/s/ Anil A. Mujumdar

Anil A. Mujumdar

AL. Bar No. 2004-L65M

Attorney for Plaintiff Alabama Disabilities
Advocacy Program

Anil A. Mujumdar

DAGNEY JOHNSON LAW GROUP

2170 Highland Avenue, Suite 250

Birmingham, AL 35213

Telephone: (205) 590-6986

Facsimile: (205) 809-7899

anil@dagneylaw.com

**ATTORNEY FOR PLAINTIFF ALABAMA DISABILITIES ADVOCACY
PROGRAM**

CERTIFICATE OF SERVICE

I hereby certify that I have on this 5th day of August, 2022 electronically filed the foregoing with the clerk of court by using the CM/ECF system, which will send a notice of electronic filing to the following:

Anne A. Hill
Deputy Attorney General
State of Alabama
Office of the Attorney General
501 Washington Avenue
Montgomery, Alabama 36104
Anne.Hill@AlabamaAG.gov

William R. Lunsford, Esq.
Matthew Reeves, Esq.
Kenneth S. Steely, Esq.
La Keisha W. Butler, Esq.
Maynard, Cooper & Gale, P.C.
655 Gallatin Street, SW
Huntsville, AL 35801
blunsford@maynardcooper.com
mreeves@maynardcooper.com
ksteely@maynardcooper.com
lbutler@maynardcooper.com

Stephanie L. Smithee, Esq.
Alabama Department of Corrections
Legal Division
301 South Ripley Street
Montgomery, AL 36104
stephanie.smithee@doc.alabama.gov

Luther M. Dorr, Jr., Esq.
Maynard, Cooper & Gale, P.C.
1901 6th Avenue North, Suite 2400
Birmingham, AL 35203
rdorr@maynardcooper.com

Philip Piggott, Esq.
Webster Henry
Two Perimeter Park South
Suite 445 East
Birmingham, AL 35243
ppiggott@websterhenry.com

Deana Johnson, Esq.
Brett T. Lane, Esq.
MHM Services, Inc.
1447 Peachtree Street, N.E., Suite 500
Atlanta, GA 30309
djohnson@mhm-services.com
btlane@mhm-services.com

/s/ Ashley N. Light
One of the Attorneys for Plaintiffs