

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION**

**NO. 5:10-CT-3135-BO**

STANLEY EARL CORBETT, )  
CHARDAN WHITEHEAD, )  
TIJUAN WILSON, )  
SAMUEL MCCRAE, )  
BILLY RIDDLE, )  
JOHN DAVIS, )  
HASEEM EVERETT, )  
JEROME PETERS, )

Plaintiffs, )

v. )

WARDEN G.J. BRANKER, )  
WARDEN KENNETH LASSITER, )  
SGT. JAMES REED, )  
SGT. MILDRED PRADO, )  
OFF. DOYLE HOLLOMAN, )  
OFF. MELANIE LANCASTER, )  
OFF. TIMMIE HICKS, )  
OFF. SAMUEL JAMES, )  
LT. MICHAEL NORRIS, )  
LT. BRENT SOUCIER, )  
OFF. MOORE, )  
OFF. PRESS, )  
OFF. SUMMERLIN, )  
OFF. ARTHUR MARSH JR., )  
OFF. OATES, )  
OFF. BIDWELL, )  
OFF. LASSITER, )  
OFF. MARCEL COLLEYMORE, )  
OFF. TYSON, )  
OFF. ALEXANDER, )  
OFF. JARED WELCH, )  
OFF. BEN MORGAN, )  
OFF. HUNT )

Defendants. )

**FIRST AMENDED COMPLAINT FOR DAMAGES, INJUNCTION, AND  
DECLARATORY RELIEF**

## **NATURE OF THE ACTION**

This is a Section 1983 civil rights action for damages, injunction, and declaratory relief. It is brought by eight prisoners in the custody of the State of North Carolina against officers and administrators at Central Prison. For years, prisoners housed on Central Prison's Unit One have repeatedly reported—in letters, grievances, and *pro se* litigation—that officers take advantage of “blind spots” in the hallway outside of Unit One to commit malicious and sadistic assaults, away from the view of any surveillance cameras. This lawsuit seeks to end this problem through an injunction mandating installation of video surveillance cameras in the Unit One hallways, a policy regarding retention of recorded video footage, and a policy setting procedures for the investigation of an officer's Use of Force on a prisoner. Given the history at Central Prison's Unit One, these measures would benefit prison officials, prisoners, and the taxpaying public, and are required by the Eighth Amendment of the United States Constitution.

## **JURISDICTION AND VENUE**

This Court has jurisdiction over Plaintiffs' claims pursuant to 42 U.S.C. § 1983, 28 U.S.C. § 1343(a)(3), and 28 U.S.C. § 1331. The Court has jurisdiction to issue the declaratory relief requested pursuant to the Declaratory Relief Act, 28 U.S.C. §§ 2201 and 2202. The Court may grant injunctive relief pursuant to 18 U.S.C. § 3626.

Venue lies in the Eastern District of North Carolina pursuant to 28 U.S.C. § 1391(b)(2), as the events complained of herein occurred in Raleigh, North Carolina.

## **PARTIES**

1. Plaintiffs Stanley Corbett, Chardan Whitehead, Samuel McCrae, Tijuana Wilson, Billy Riddle, John Davis, Haseem Everett, and Jerome Peters are all prisoners in the custody of

the state agency formerly known as the N.C. Department of Correction (NCDOC). This agency is now known as the N.C. Department of Public Safety (NCDPS).

2. At all times relevant to this action, Plaintiffs were confined on Unit One at Central Prison in Raleigh, North Carolina.
3. As of the date of this Complaint, Plaintiffs Corbett, Whitehead, Davis, and Everett remain confined on Unit One at Central Prison.
4. Plaintiffs Wilson, McCrae, Riddle, and Peters have been transferred to other NCDPS facilities.
5. NCDPS retains the right to transfer Plaintiffs Wilson, McCrae, Riddle, and Peters back to Unit One at Central Prison at any time.
6. At all times relevant to this action, Defendants were employed by NCDOC and/or NCDPS at Central Prison. All defendants other than Warden G.J. Branker and Warden Kenneth Lassiter were present at and participated in a malicious and sadistic assault on a named plaintiff. All of these defendants are named in their individual and official capacities.
7. During their respective tenures, Warden G.J. Branker and Warden Kenneth Lassiter were aware of “blind spots” in the hallway outside of Unit One.
8. During their respective tenures, Warden G.J. Branker and Warden Kenneth Lassiter were aware that no policy existed regarding the retention of video footage captured inside of the blocks inside of Unit One.
9. During their respective tenures, Warden G.J. Branker and Warden Kenneth Lassiter were aware of the lack of any policy regarding the proper method of “investigating” a “Use of Force incident.”

10. During their respective tenures, Warden G.J. Branker and Warden Kenneth Lassiter were aware of an excessive risk of malicious and sadistic assaults created by the lack of video surveillance, “blind spots” in the hallway outside of Unit One, the lack of any policy regarding the retention of video footage captured inside of the block inside of Unit One and the lack of any policy regarding the proper method of “investigating” a “Use of Force incident.”
11. As the head administrator at Central Prison, the Warden has the authority to rectify all of these issues. As such, the Warden of Central Prison is named in his individual and official capacity.
12. In regard to all matters complained of herein, defendants were acting as employees and agents of the North Carolina Department of Corrections and/or the North Carolina Department of Public Safety, under color of state law.

### **FACTUAL ALLEGATIONS**

#### **I. Life on Central Prison’s Unit One**

1. Central Prison was the first prison built in North Carolina. It is a close custody facility for male offenders, originally built in 1884.
2. Central Prison’s Unit One is a “lock up” unit, known in prison slang as “the hole.”
3. The men who live on Unit One are held in solitary confinement, one man per 80-square-foot cell for between 23 and 24 hours per day.
4. The door to each cell on Unit One is solid metal, with a locking slot referred to as a “trap” for passing food trays, mail, and other items. A man must submit to handcuffs through this slot before exiting his cell.

5. Men are entitled to leave their cells only 8 times per week. They are allotted five 1-hour recreation sessions per week, and three 10-minute showers per week.
6. Whenever men are removed from their cells, they are placed in “full restraints,” which means that an officer shackles the man at his feet with a set of handcuffs. Then, the officer wraps a chain around the man’s waist, and puts his wrists in handcuffs. Finally, the officer runs the waist chain through a black box, and secures it with a Master Lock.
7. Unit One was constructed in 1983.
8. Unit One has two floors. Each floor has 3 separate blocks of single cells. Each block contains 32 cells. On the west side of each block, there is a row of 8 cells on a lower tier and a row of 8 cells on an upper tier. The east side of each block is identical to the west side.
9. On the lower floor, the blocks are referred to as “1A,” “1B,” and “1C.”
10. On the upper floor, the blocks are referred to as “2A,” “2B,” and “2C.”
11. Unit One houses a maximum of 192 men (6 blocks of 32 cells each).
12. Just outside of the Unit One blocks, on both the upper and lower levels, there is a long hallway.
13. Along the upper level hallway, there is a medical station, various offices, including the “Sergeant’s office,” and a room with a hose and drain, used for decontamination of prisoners after the use of pepper spray. The prisoners call the decontamination room the “mop closet.”
14. Along the lower level hallway, there are various offices and closets. In the far west corner of the lower level hallway, near Block 1A, there is a bank of holding cages.
15. On each long hallway, there is one mounted video camera, installed in 1983.

16. This configuration creates notorious “blind spots” in the corners.
17. Prisoners frequently refer to this area as the “desert.”
18. Unit One prisoners generally believe that the mounted hallway video cameras have the capacity to record.
19. In fact, the hallway video cameras do not have any capacity to record whatsoever.
20. Inside the blocks, there are mounted video cameras with recording capability.
21. Central Prison has no written procedure governing the use of and retention of recorded footage from mounted video cameras. As a result, the footage is typically “recycled” automatically within 14-31 days of its capture.
22. Central Prison has no written policy regarding how staff should complete an “investigation” and “Incident Report” when an officer “uses force” on a prisoner.
23. The allegations recounted above have created an environment in Unit One that allows officers to maliciously and sadistically assault inmates with impunity.
24. These assaults have occurred continually over the years and continue to occur to the present day.

## **II. The Unit One “Blind Spots” Have Produced Prior E.D.N.C. Litigation**

25. For several years, this Court has entertained prisoner litigation complaining about officer-on-inmate assaults occurring in the “blind spots” in the hallway outside of Unit One.
  26. Between 2009 and 2011, at least five prisoners independently filed suit against correctional officials at Central Prison relating to assaults in the “blind spots” in the hallways outside of Unit One.
  27. Plaintiffs have no information about whether the non-party lawsuits are meritorious.
- However, Plaintiffs do allege that the lack of video surveillance cameras in the Unit One

hallway location hinders meritorious claims by prisoners, and hampers the court from easily disposing of frivolous claims.

28. Plaintiffs bring the existence of these prior lawsuits to the Court's attention as evidence of an ongoing problem that supports their current request for injunctive relief.

**A. Assault on Plaintiff Stanley Corbett**

29. Plaintiff Stanley Corbett initiated the instant lawsuit through a *pro se* complaint.

30. On the morning of December 19, 2008, Plaintiff Stanley Corbett was showering on the upper tier on the west side of Block 2A.

31. Off. Lancaster went to the upper tier shower to remove Corbett.

32. Corbett was still covered in soap.

33. Corbett asked Off. Lancaster for the opportunity to finish rinsing off the soap.

34. Off. Lancaster sprayed Corbett with pepper spray in his face and penis.

35. Off. Holloman put Corbett in handcuffs and removed him from the shower.

36. Off. Holloman escorted Corbett out of Block 2A, onto the upper level hallway, and from there, to the mop closet for decontamination.

37. In the mop closet, Sgt. Reed, Sgt. Prado, Off. Hicks, and Off. Holloman assaulted Corbett, though he did not resist.

38. At this time, Corbett was restrained.

39. Afterward, Corbett was taken downstairs to the lower level hallway, and placed in "the desert" holding cells outside of Block 1A in the far west corner.

40. Some hours later, Off. James removed Corbett from "the desert" holding cells, and began to escort him down the lower level hallway.

41. Off. James pushed Corbett into the second door on the left side of the hallway, a room that appeared to be a small storage closet.
42. Off. Lancaster was waiting inside the closet. Off. Lancaster and Off. James punched Corbett and squeezed his groin, threatening that if he reported the assault, Off. James would kill Corbett.
43. At this time, Corbett was restrained.
44. Corbett suffered physical and emotional injuries as a result of this series of assaults, including cuts, bruises, pain, and swelling.
45. The surveillance video cameras installed inside Block 2A have the capability to record any movement in the block.
46. If the shower altercation between Off. Lancaster and Corbett was recorded, however, no video was retained.
47. There are no video cameras that have the capability to record any events in the long hallways outside of the Unit One blocks, including occurrences in the mop closet, “the desert,” the stairwells, the offices, or elsewhere.

**B. Pro Se Complaint of Non-Party Austin R. Pittman**

48. Non-party Austin Pittman initiated a *pro se* complaint in the Eastern District of North Carolina. See 5:09-ct-3051-D (filed 3/16/2009). Pittman alleged that on February 26, 2009, he complained to Sgt. Andino about a problem with his food tray on a Unit One block. Off. Andino sprayed pepper spray on Pittman, removed him from his cell, and then took him to the mop closet to be decontaminated. While in full restraints, Officers McMillian and Fox beat Pittman in an empty office on the second floor Unit One hallway.



49. The surveillance video cameras installed inside the Unit One blocks have the capability to record any movement in the block.
50. If the initial interaction was recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.
51. There are no video cameras that have the capability to record any events in the hallway, including occurrences in the mop closet, “the desert,” the stairwells, the offices, or elsewhere.

**C. Complaint of Non-Party Jerry Williams**

52. Non-party Jerry Williams, through counsel, initiated a complaint in the Eastern District of North Carolina. *See* 5:12-ct-3055-D (amended complaint filed 10/9/12). He alleged that on September 17, 2009, Sgt. Griffin sprayed him with pepper spray while he was inside his cell on one of the Unit One blocks. Officers removed Williams from his cell, and took him to the mop closet to be decontaminated. In the Sergeant’s office on the second floor Unit One hallway, Sgt. Griffin beat Williams and Off. James broke Williams’s fingers by twisting them.
53. The surveillance video cameras installed inside the Unit One blocks have the capability to record any movement in the block.
54. If the initial interaction was recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.
55. There are no video cameras that have the capability to record any events in the hallway, including occurrences in the mop closet, “the desert,” the stairwells, the offices, or elsewhere.

**D. Pro Se Complaint of Non-Party Sherman Thompson**

56. Non-party Sherman Thompson filed a *pro se* complaint in the Eastern District of North Carolina. *See* 5:11-ct-3127-FL (filed 7/13/11). He alleged that on March 16, 2010, Off. McMillian removed him from his cell on a Unit One block. Off. McMillian escorted Thompson out of the block onto the hallway to a “sergeant office of sight of hallway camera.” Off. McMillian kicked and stomped on Thompson’s head, eye, and buttocks.
57. On February 11, 2013, Judge Flanagan ordered defendants to produce surveillance video of this incident. *See* 5:11-ct-3127-FL, D.E. 35.
58. On February 18, 2013, defendants filed an affidavit stating that “no surveillance video footage” exists for the incident. *Id.* at D.E. 36.

**E. Pro Se Complaint of Non-Party Mark Miller**

59. Non-party Mark Miller filed a *pro se* complaint in the Eastern District of North Carolina. *See* 5:11-ct-3024-BO. He alleged that on May 19, 2010, Off. Correll approached Mark Miller’s cell on Block 2A and sprayed pepper spray through the trap. Officers removed Miller from his cell, took him to the “mop closet” for decontamination, and assaulted him by throwing Miller’s face into the door.
60. The surveillance video cameras installed inside the blocks have the capability to record any movement in the block.
61. If the initial interaction was recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.

62. There are no video cameras that have the capability to record any events in the hallway, including occurrences in the mop closet, “the desert,” the stairwells, the offices, or elsewhere.

### **III. The Violence in the Unit One Blind Spots Has Increased**

63. During the last year, the severity of the violence taking place in the Unit One hallway blind spots has increased.

64. From December 2011 to December 2012, at least 5 individuals have suffered concussion, stitches, or broken bones in the Unit One hallway blind spots.

65. Many other prisoners have complained of less severe injuries occurring in the same location.

#### **A. Assault of Plaintiff Chardan Whitehead**

66. On December 6, 2011, Off. Tyson and Off. Alexander were escorting Chardan Whitehead from the indoor recreation cage inside one of the Unit One blocks to his cell on the same block.

67. On the way, Whitehead and Off. Tyson got into an altercation.

68. The officers sprayed Whitehead in face with pepper spray, and he fell to the floor.

69. The officers escorted Whitehead off of the block and into the hallway toward “the desert” holding cages.

70. Off. Tyson knocked Whitehead down, and then Off. Tyson and Off. Alexander punched and kicked Whitehead in the head and torso until Whitehead lost consciousness.

71. The officers left Whitehead in “the desert” holding cages.

72. Whitehead suffered physical and emotional injuries as a result of the assaults. He suffered a concussion; he received sutures to his head near his eye and was transported to WakeMed emergency room for a CT SCAN. He was unable to see out of the left eye for several weeks.
73. The surveillance video cameras installed inside the block have the capability to record any movement in the block.
74. If the initial altercation between Whitehead and Tyson was recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.
75. There are no video cameras that have the capability to record any events in the hallway, including occurrences in the mop closet, “the desert,” the stairwells, the offices, or elsewhere.

**B. Assault of Plaintiffs Tijuana Wilson & Samuel McCrae**

76. On April 23, 2012, Samuel McCrae and Tijuana Wilson were housed in adjacent cells on Unit One’s 2B block.
77. Off. Marsh served dinner trays to McCrae and Wilson. The dinner trays were missing the meat. The dinner trays contained only gravy and bread.
78. Other men on the block experienced the same problem that day. This was a regular occurrence.
79. McCrae and Wilson asked for a tray with a full portion of food. Officers refused to provide it.

80. Because McCrae and Wilson were tired of not getting full meals, McCrae and Wilson decided to hang their arms through the open trap doors until they received full portions of food.
81. Off. Hunt, Off. Welch, Off. Marsh, and Off. Morgan approached the cells, placing gloves on their hands.
82. Off. Hunt and Off. Welch began repeatedly to slam the heavy, metal trap door on McCrae's arms and hands.
83. Meanwhile, Off. Marsh began repeatedly to slam the heavy, metal trap door on Wilson's right forearm and elbow, while Off. Morgan held down Wilson's right hand, preventing him from pulling it back out of the trap door.
84. Both McCrae and Wilson suffered physical and emotional injuries as a result of the assaults. McCrae's left hand was cut, bleeding, and experienced swelling. Wilson's right forearm and elbow was also cut, bleeding, and swelling.
85. Off. Hunt, Off. Welch, Off. Marsh, and Off. Morgan left for the evening without telling the next shift about the incident, and without alerting medical staff.
86. Despite repeatedly asking for medical attention, neither McCrae nor Wilson received attention until the following day, April 24, 2012.
87. Two mounted video cameras installed inside Block 2B have the capability to record any movement in the block.
88. If this assault was video-recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.

**C. Assault of Plaintiff Billy Riddle**

89. On August 12, 2012, Off. Moore and Off. Press handcuffed Billy Riddle and removed him from his cell on one of the Unit One blocks for a “cell search.”

90. While Riddle was waiting, Off. Summerlin punched Riddle in the face.

91. Then, the officers moved Riddle off the block, into the hallway, and to “the desert” holding cages, where Off. Sumerlin, Off. Press, and Off. Moore punched and kicked Riddle throughout his torso.

92. Riddle requested medical attention for 11 days without receiving it.

93. Eleven days later, on August 23, 2011, Riddle was seen by a physician assistant, who ordered an X-ray.

94. Riddle suffered physical and emotional injuries as a result of the assaults. The X-ray showed that Riddle had suffered broken ribs.

95. The surveillance video cameras installed inside the block have the capability to record any movement in the block.

96. If the initial interaction between Off. Summerlin and Riddle was recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.

97. There are no video cameras that have the capability to record any events in the hallway, including occurrences in the mop closet, “the desert,” the stairwells, the offices, or elsewhere.

**D. Assault of Plaintiff John Davis**

98. On September 11, 2012, Off. Marsh approached Davis's cell and ordered him to submit to handcuffs.

99. Off. Marsh and a second officer removed Davis from his cell and escorted him off the block into the hallway.

100. Off. Marsh threw Davis into the railing on the wall, and then, while he was on the floor, kicked him repeatedly in the head, back, and ribs.

101. After the beating, Lt. Norris pressed his thumb on the pressure point behind Davis's ear, and threatened him.

102. Davis did not receive medical attention until over 24 hours later.

103. Davis suffered physical and emotional injury as a result of the assaults. He experienced bleeding, swelling, and pain throughout his body, especially his left hand, left wrist, and rib cage. He suffered a fractured rib on the left side.

104. The surveillance video cameras installed inside the block have the capability to record any movement in the block.

105. If the initial interaction between Off. Marsh and Davis was recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.

106. There are no video cameras that have the capability to record any events in the hallway, including occurrences in the mop closet, "the desert," the stairwells, the offices, or elsewhere in the hallway.

**E. Assault of Plaintiff Haseem Everett**

107. On November 18, 2012, Haseem Everett requested medical attention for chest pain. Sgt. Oates and Off. Bidwell reported to Everett's cell on one of the Unit One blocks, placed him in handcuffs, and escorted him out of the block. Once off the block, the officers placed Everett in full restraints.
108. The officers continued to escort Everett down the hallway outside of the Unit One blocks towards the medical station.
109. Lt. Soucier was straddling the doorway of the Sergeant's office, as Everett and the officers walked down the hallway towards the medical station.
110. Lt. Soucier punched Everett, knocking him Everett down, and then several other officers came running out of the Sergeant's office and began to stomp and kick Everett.
111. Everett suffered physical and emotional injury as a result of the assaults. He received stiches to his face, and suffered bruises and abrasions. He had difficulty speaking because of bruising to his throat and neck.
112. The surveillance video cameras installed inside the block have the capability to record any movement in the block.
113. If the initial interaction between the officers and Everett was recorded, however, it is likely that it has not been retained because there is no video retention policy in place at Central Prison.
114. There are no video cameras that have the capability to record any events in the hallway, including occurrences in the mop closet, "the desert," the stairwells, the offices, or elsewhere.



**F. Assault of Plaintiff Jerome Peters**

115. On December 3, 2012, Off. Colleymore and Off. Marsh were escorting Peters in the lower level hallway back from outdoor recreation. Peters was handcuffed behind the back.
116. Off. Lussier approached, and punched Peters in the face. Off. Marsh grabbed Peters' right leg and Off. Colleymore grabbed his left leg, and pulled him down to the ground.
117. Off. Colleymore, Off. Marsh, and Off. Lussier kicked, stomped, and punched Peters.
118. When they finished, the officers put shackles on Peters's ankles and ordered him to walk.
119. Peters was unable to walk because—as he later learned—the officers had broken his pelvic bone.
120. At the nursing station, Lt. Norris took photographs of the parts of Peters's body that were not injured.
121. Peters told the nurses that he believed his leg was broken. However, the nurses gave him only Tylenol and sent him back to his cell.
122. Later in the day, Off. Marsh returned to Peters's cell to deliver lunch. When the trap door was opened to deliver the meal, Off. Marsh attempted to spray Peters with pepper spray through the slot.
123. Lt. Norris then came to Peters's cell and ordered him to submit to handcuffs.

124. Peters was afraid and in excruciating pain from the broken pelvis and broken hand. He refused the order to submit to handcuffs.
125. A cell extraction team forcibly extracted Peters from his cell.
126. Back at the nurse's station, Nurse Wilkerson ordered that Peters be taken to the Emergency Room.
127. Peters suffered physical and emotional injury as a result of the beating. He incurred a broken right hip, a fractured bone in the left hand, a fractured bone in the face, blurry vision, and other cuts and bruises. He received surgery on his hip the next day at WakeMed Hospital.
128. Since this incident, Peters has been confined to a wheelchair and unable to walk.
129. There are no video cameras that have the capability to record any events in the Unit One hallway, including occurrences in the mop closet, "the desert," the stairwells, or elsewhere.

**CAUSE OF ACTION**  
**EIGHTH AMENDMENT OF THE U.S. CONSTITUTION**

As a direct and proximate result of the acts and omissions of the Defendants, as detailed above, the Plaintiffs have suffered unnecessary, excessive, malicious, and sadistic force in violation of their rights to be free from cruel and unusual punishment, as guaranteed by the Eighth Amendment of the U.S. Constitution.

**PRAYER FOR RELIEF**

WHEREFORE, the plaintiffs respectfully request that the Court:

- (a) Declare that defendants' acts and omissions violated the plaintiffs' rights under the Eighth and Fourteenth Amendments to the U.S. Constitution and

- that these acts and omissions continue to cause ongoing violations of these rights;
- (b) Enter a preliminary and permanent injunctive relief requiring defendants to end the ongoing constitutional violations;
  - (c) Award compensatory and punitive damages for all injuries sustained by the individual named plaintiffs as a result of the violations of their constitutional rights;
  - (d) Award the plaintiffs reasonable attorneys' fees and costs under 42 U.S. C. § 1988; and;
  - (e) Grant any other relief that the Court deems necessary and proper.

Respectfully submitted, this 1st day of May,

/s/ Elizabeth G Simpson  
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing, FIRST AMENDED COMPLAINT, with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

**Scott B Goodson**

N. C. Dept. of Justice  
P.O. Box 629  
Raleigh, NC 27602-0629  
919-716-6533  
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This the 1<sup>st</sup> day of May

/s/ David S. Strauss

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