## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DIVISION, EASTERN JUDICIAL DISTRICT OF MISSOURI

ROBERT ERNEST BULLINGTON, et al,	)
Plaintiffs	) Cause No. 79-650 c <b>F4   L E D</b>
vs	NOV 79 1070
WARDEN MORELAND, et al,	)
Defendants.	U. S. DISTRICT COURT E. DISTRICT OF MO.

## PLAINTIFFS' INTERROGATORIES DIRECTED TO DEFENDANTS

Come now plaintiffs and pursuant to Civil Rule 57.01 tenders the following interrogatories to be answered by defendants, pursuant to the terms of said Rule, as follows:

- 1. With regard to the legal books located in the St. Louis County Jail, please state:
  - a. List the books housed in the St. Louis County Jail.
  - b. Describe the rooms that house the legal books.
  - c. If the rooms that house the legal books are used for any other purposes, please state for what purposes.
  - d. Describe the procedures and rules governing the use and access to the legal books by the inmates.
  - e. What are the procedures and steps used to insure that an inmate has "reasonable access" to law books not housed in the St. Louis County Jail.
- 2. With regard to the Disciplinary and Grievance Procedures at the St. Louis County Jail, please state:
  - a. Please state in detail the steps used in disciplining inmates from the moment of a violation all the way to any appeal process (i.e., what remedies are available to an inmate who appeals).
  - b. Describe the punishment associated with a violation of St. Louis County Jail Rules.
  - c. List the institutional rules and regulations regarding inmates housed at the St. Louis County Jail.
  - d. Describe in detail the procedures that exist for an inmate to file a grievance regarding his treatment at the St. Louis County Jail.
  - 3. With regard to personal property which inmates may possess at the St. Louis County Jail, please state:
    - a. List the property which inmates may have in their possession at the St. Louis County Jail.
    - b. What property may the inmates receive through the mail.



- c. List the reading material which is "subversive literature" and pornographic material as listed in the inmates' rule book.
- d. Describe the procedure used in delivering mail addressed to the inmates.
- e. Describe the procedure used in delivering mail addressed to an inmate from the court or from an attorney.
- f. List the books, magazines, newspapers and periodicals which inmates may not receive through the mail or have in their possession.
- g. Exlain in detail how it is decided which books, magazines and newspapers an inmate may not receive.
- h. What restrictions are there on the <u>number</u> of books, magazines and newspapers which an inmate may have in his cell at any time.
- 4. With regard to visitation and phone use, please describe:
  - A. The visiting facilities for inmate's family and friends.
    - 1) Location.
    - 2) Size.
    - Floor plan.
    - 4) Capacity.
    - 5) Length of family visits and how they communicate during visits.
    - 6) Number of visits per week per inmate.
    - 7) Jail visiting hours.
    - 8) Contact visitation program.
  - B. Describe the jail visiting facilities for attorneys:
    - Location and size of rooms.
    - 2) Visiting hours.
  - C. What procedures are used to provide inmates with the use of public phones:
    - 1) Number of calls per week.
    - Length of calls.
    - Where are calls made.
    - 4) When are calls made.
    - 5) Are calls monitored or recorded.
- 5. With regard to the medical treatment available to inmates please state:
  - a. A complete description of the medical, mental health and dental care provided and the facilities in the jail.
  - b. What are the qualifications and training of all medical staff personnel employed at the jail.
  - c. What hours are medical staff personnel on duty.
  - d. What medical services are available after 4:00 p.m. to 8:00 a.m. daily and on weekends and holidays.
  - e. What are the procedures for an inmate to obtain medical treatment after 4:00 p.m. to 8:00 a.m. daily and on weekends and holidays.

- How often is mental health service available.
- g. What are the procedures for obtaining mental health care.
- h. What mental health care is provided to inmates being held in isolation because of mental or emotional problems.
- i. How often does a medical doctor visit the jail.
- With regard to the atmosphere maintained at the St. Louis County Jail, please state:
  - a. Complete description of the environmental control system (heating and cooling).
  - b. At what tempartures are the cell areas maintained.
  - c. What is the air exchange rate for the cell areas of the St. Louis County Jail.

HENDERSON, HEAGNEY & THOMAS

James L. Thomas

Attorneys for Plaintiffs 506 Olive, Suite 605 St. Louis, MO 63101

A copy of the foregoing interrogatories mailed to Donald

J. Weyerich, Special Assistant County Counselor

41 North Central, Clayton, MO 63105, attorney for defendants, this 16th day of Nøvember, 1979

Tures

Thomas