

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

EDWARD BRAGGS, et al., )  
)  
Plaintiffs, )  
)  
v. )  
)  
JEFFERSON DUNN, in his official )  
capacity as Commissioner )  
of the Alabama Department of )  
Corrections, et al., )  
)  
Defendants. )  
)

CIVIL ACTION NO.  
2:14-CV-00601-MHT-GMB  
Judge Thompson

**PLAINTIFFS' FIRST AMENDED WITNESS AND EXHIBIT LISTS FOR  
THE SUICIDE PREVENTION REMEDIAL TRIAL**

Plaintiffs hereby submit their First Amended Witness and Exhibit List for the Phase 2A suicide prevention remedial trial rescheduled to begin on Thursday March 28, 2019.

The Parties submitted witness and exhibit lists at 5:00pm on March 22, 2019. Plaintiffs reserved the right to amend their exhibit list to include any documents produced after the time of its filing. Doc. 2347. Plaintiffs also reserved the right to amend their witness list to include any witness whose testimony appears to be necessary in light of documents produced after the time of this filing.

In light of the Pretrial Hearing held on March 25, 2019 (Doc. 2441) and the rescheduling of the remedial trial on suicide prevention, Plaintiffs hereby amend their witness list.

Plaintiffs' expert Eldon Vail will testify by videoconference. Plaintiffs will make all necessary arrangements with the Clerk of Court's office.

### I. WITNESS LIST

<b>WITNESS</b>	<b>DATE</b>	<b>LENGTH</b>	<b>TOPICS</b>
Dr. Edward Kern (will call)	March 28, 2019	5 hours	ADOC's Director of Psychiatry Dr. Kern will testify regarding efforts made to limit housing of persons with serious mental illness in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Charles Daniels (will call)	March 28, 2019	2 hours	ADOC's Deputy Commissioner of Operations Daniels will testify regarding efforts made to ensure the occurrence of security checks in segregation and adherence to remedial orders.
J.A. (will call)	March 29, 2019	1 hour	J.A. is a prisoner currently housed at Donaldson Correctional Facility. He has been housed in segregation, segregation-like units, and in crisis placements at Easterling, Kilby, and Donaldson Correctional Facilities within the last year. He will testify about conditions in segregation, segregation-like units, and crisis cells and their impact on his mental health.

<b>WITNESS</b>	<b>DATE</b>	<b>LENGTH</b>	<b>TOPICS</b>
Deborah Crook (will call)	March 29, 2019	3 hours	ADOC's Director of Mental Health Services Ms. Crook will testify regarding efforts made to limit housing of persons with serious mental illness in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Barbara Harris Coe (will call)	April 1, 2019	4 hours	Ms. Coe is Wexford's Mental Health Program Director. She will testify regarding efforts made to limit housing of persons with serious mental illness in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Jefferson Dunn (will call)	April 1, 2019	2 hours	ADOC Commissioner Dunn will testify regarding placements of high risk prisoners in segregation, and efforts made to limit housing of persons with serious mental illness in segregation, ensure the occurrence of security checks in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Deidra Wright (may call)	April 1, 2019	2 hours	Warden Wright is a Warden at Tutwiler Prison for Women. She will testify about the conditions in segregation and segregation-like units at Tutwiler and what, if any, action was taken following recent serious suicide attempts.
Christopher Gordy (will call)	April 2, 2019	6 hours	Warden Gordy is a Warden at Donaldson Correctional Facility. He will testify regarding the housing of persons with serious mental illness in segregation and segregation-like settings, and efforts made to ensure the occurrence of security checks in segregation and adherence to remedial orders.

Ruth Naglich (will call)	April 2-3, 2019	6 hours	ADOC Associate Commissioner of Health Services Naglich will testify regarding placements of high risk prisoners in segregation, and efforts made to limit housing of persons with serious mental illness in segregation, ensure the occurrence of security checks in segregation, ensure adherence to remedial orders, and address the recent suicides in the ADOC.
Eldon Vail (will call)	April 3, 2019, 1:00pm	3 hours	The Court recognized Mr. Vail as an expert in correctional administration in its Liability Opinion, overruling Defendants' Daubert objections. <i>Braggs v. Dunn</i> , 257 F. Supp. 3d 1171, 1186-88 (M.D. Ala. 2017); <i>see also Braggs v. Dunn</i> , No. 2:14-cv-601, 2017 WL 2984312 (M.D. Ala. July 13, 2017). As permitted by the Understaffing Order, Plaintiffs' expert Eldon Vail filed a response to the Defendants' staffing analysis on July 1, 2018. Doc. 1920-1. Mr. Vail will testify about the risks of and alternatives to placing people with serious mental illness and other high-risk individuals in segregation. Mr. Vail will also testify about ADOC's failure to employ practices that minimize the substantial risk of serious harm in segregation.

Dr. Kathryn Burns (will call)	April 8, 2019 10:00 a.m.	2 days	The Court has recognized Dr. Burns as an expert in this case and relied on her expert testimony in its liability opinion. <i>Braggs v. Dunn</i> , No. 2:14-cv-601, 2017 WL 2984312 at *3-4; <i>see also Braggs v. Dunn</i> , 257 F. Supp. 3d 1171 (M.D. Ala. 2017). She has since testified without objection from Defendants in the Understaffing, Segregation, and Residential Treatment Remedial Trials. Dr. Burns will testify about ADOC's practice of placing high-risk individuals in segregation. Dr. Burns will testify about the risks of and alternatives to placing people with serious mental illness and other high-risk individuals in segregation. Dr. Burns will also testify about ADOC's failure to employ practices that minimize the substantial risk of serious harm in segregation.
Any witness identified by Defendants.			Any witness necessary for impeachment or rebuttal.

## II. EXHIBIT LIST

### Previously Marked Exhibits

Ex. No.	Title	Bates/Docket Number
P-318	Oct. 8, 2015 Email from Kern to Hunter	MHM055953
P-387	Oct. 7, 2015 Email from Naglich to Crook et al.	MHM043865-043866
P-1097	NCCHC Position Statement on Solitary Confinement (Isolation)	
P-1267	Chart of 2015-2017	

	Suicides in ADOC	
P-1302	RFP 2017-02 – Comprehensive Inmate Healthcare Services	
P-1340	Position Classification Questionnaire	
P-1398	Administrative Regulation 433 Admin Seg	
P-1399	Administrative Regulation 434 Disciplinary Seg	
P-1488	B.T. Incident Report	ADOC0421089- ADOC0421092
P-1489	Billy Thornton Medical Records	ADOC0420708- ADOC0420860
P-1493	Robert Martinez Medical Records	ADOC0420968- ADOC0421074
P-1496	Robert Martinez Suicide Review Documents	ADOC0421129- ADOC0421135
P-1520	May 8, 2017 Letter	
P-1521	January 9, 2018 Letter	
P-1522	April 10, 2018 Suicide Prevention Compliance Letter	
P-1523	May 1, 2018 Suicide Prevention Compliance Letter	
P-1524	March 17, 2017 Letter re monitoring of interim agreement	
P-1525	April 3, 2017 Email	
P-1532	May 2018 Wexford Monthly Report	ADOC0424214- ADOC0424607
P-1533	June 2018 Wexford Monthly Report	ADOC0423819- ADOC0424213

P-1539	Suicide Watch Logs January 1-15, 2017	
P-1540	Suicide Watch Logs January 16-31, 2017	
P-1541	Suicide Watch Logs February 16-28, 2017	
P-1542	Suicide Watch Logs March 16-31, 2017	
P-1543	Suicide Watch Logs April 1-15, 2017	
P-1544	Suicide Watch Logs April 16-30, 2017	
P-1545	Suicide Watch Logs May 16-31, 2017	
P-1546	Suicide Watch Logs June 16-30, 2017	
P-1547	Suicide Watch Logs July 1-15, 2017	
P-1548	Suicide Watch Logs July 16-31, 2017	
P-1549	Suicide Watch Logs August 16-31, 2017	
P-1550	Suicide Watch Logs September 16-30, 2017	
P-1551	Suicide Watch Logs October 1-15, 2017	
P-1552	Suicide Watch Logs October 16-31, 2017	
P-1553	Suicide Watch Logs November 1-15, 2017	
P-1554	Suicide Watch Logs November 16-30, 2017	
P-1555	Suicide Watch Logs December 16-31, 2017	
P-1556	Suicide Watch Logs - January 1-15, 2018	
P-1557	Suicide Watch Logs - January 16-31, 2018	
P-1558	Suicide Watch Logs -	

	February 1-15, 2018	
P-1559	Suicide Watch Logs – February 16-28, 2018	
P-1560	Suicide Watch Logs – March 1-15, 2018	
P-1561	Suicide Watch Logs – March 16-31, 2018	
P-1562	Suicide Watch Logs – April 1-15, 2018	
P-1563	Suicide Watch Logs – April 16-30, 2018	
P-1564	Suicide Watch Logs – May 1-15, 2018	
P-1565	Suicide Watch Logs – May 16-31, 2018	
P-1566	Suicide Watch Logs – June 1-15, 2018	
P-1567	Suicide Watch Logs – June 16-30, 2018	
P-1568	Suicide Watch Logs – July 1-15, 2018	
P-1569	Suicide Watch Logs – July 16-31, 2018	
P-1570	Suicide Watch Logs – August 1-15, 2018	
P-1576	April 2018 Wexford Monthly Report	ADOC0423323- ADOC0423467
P-1578	Suicide Watch Report – January 2017	
P-1579	Suicide Watch Report – February 2017	
P-1580	Suicide Watch Report – March 2017	
P-1581	Suicide Watch Report – April 2017	
P-1582	Suicide Watch Report – May 2017	
P-1583	Suicide Watch Report	



	– June 2017	
P-1584	Suicide Watch Report – July 2017	
P-1585	Suicide Watch Report – August 2017	
P-1586	Suicide Watch Report – September 2017	
P-1587	Suicide Watch Report – October 2017	
P-1588	Suicide Watch Report – November 2017	
P-1589	Suicide Watch Report – December 2017	
P-1590	Suicide Watch Report - January, 2018	
P-1591	Suicide Watch Report - February, 2018	
P-1592	Suicide Watch Report - March, 2018	
P-1593	Suicide Watch Report - April, 2018	
P-1594	Suicide Watch Report - May, 2018	
P-1595	Suicide Watch Report - June, 2018	
P-1596	Suicide Watch Report - July, 2018	
P-1601	July 2018 Bibb Duty Post Logs	
P-1617	Aug. 2018 Bibb Duty Post Logs	
P-1635	Notice of Filing with Exhibit A Savages' Correctional Staffing Analysis Report (SEALED)	Doc. 1813
P-1641	J.A. Medical Records, July 2017-July 2018	ADOC0434090- ADOC0434408

P-1643	Jeffery Borden Medical Records	ADOC0424844- ADOC0425007
P-1646	Timothy Chumney Medical Records	ADOC0425008- ADOC0425131
P-1653	Paul Ford Medical Records	ADOC0425877- ADOC0425891
P-1654	Paul Ford Medical Records	ADOC0435025- ADOC0435112
P-1657	D.G. Medical Records, July-Oct. 2018	ADOC0425416- ADOC0425729
P-1669	Ben McClure Medical Records	ADOC0424783- ADOC0424843
P-1678	Billy Thornton Medical Records	ADOC0425183- ADOC0425223
P-1682	Suicide Watch Report - August, 2018	
P-1684	Suicide Watch Logs – August 16-31, 2018	
P-1685	Suicide Watch Report - September, 2018	
P-1686	Suicide Watch Logs – September 1-15, 2018	
P-1687	Suicide Watch Logs – September 16-30, 2018	
P-1688	Sept. 2018 Bibb Duty Post Logs	
P-1690	Bullock OP Group Logs / Sept.-Oct. 2018	ADOC0440332- ADOC0440343
P-1691	Easterling Group Logs / Sept.-Oct. 2018	ADOC0440344- ADOC0440356
P-1692	Elmore Group Logs / Sept.-Oct. 2018	ADOC0440357- ADOC044036
P-1693	Hamilton Group Logs / Sept.-Oct. 2018	ADOC0440362- ADOC0440379

P-1694	Kilby Group Logs / Sept.-Oct. 2018	ADOC0440380- ADOC0440383
P-1695	Limestone Group Logs / Sept.-Oct. 2018	ADOC0440384- ADOC0440386
P-1696	St Clair Group Logs / Sept.-Oct. 2018	ADOC0440387- ADOC0440394
P-1697	Staton Group Logs / Sept.-Oct. 2018	ADOC0440395- ADOC0440404
P-1698	Tutwiler Group Logs / Sept.-Oct. 2018	ADOC0440405- ADOC0440524
P-1699	Ventress Group Logs / Sept.-Oct. 2018	ADOC0440525- ADOC0440531
P-1721	Bullock Group Activity Rosters / Sept.-Oct. 2018	ADOC0441278- ADOC0441461
P-1722	Elmore Staton Group Activity Logs / Sept.- Oct. 2018	ADOC0441462- ADOC0441505
P-1725	IMAS Caseload Report (PDF)	ADOC0441628- ADOC0441690
P-1726	IMAS - SMI Report (EXCEL)	ADOC0441628- ADOC0441690
P-1728	Donaldson IP Group Logs / Sept.-Oct. 2018	ADOC0441730- ADOC0441814
P-1731	Bibb Group Logs / Sept.-Oct. 2018	ADOC0442125- ADOC0442126
P-1738	July 2018 Wexford Monthly Report	ADOC0439014- ADOC0439171
P-1748	Suicide Watch Logs – October 1-15, 2018	
P-1749	Oct. 30, 2018 Segregation Roster	ADOC0441580- ADOC0441627
P-1750	April 2018 Crisis Cell Utilization Logs	SPA_0076-SPA_0130; SPA_0216-SPA_0226; SPA_0381

P-1751	May 2018 Crisis Cell Utilization Logs	SPA_0388-SPA_0469; SPA_0363-SPA_0372
P-1752	June 2018 Crisis Cell Utilization Logs	SPA_0281-SPA_0362; SPA_0382-SPA_0384
P-1753	July 2018 Crisis Cell Utilization Logs	SPA_0227-SPA_0280; SPA_0373-SPA_0380; SPA_0385-SPA_0387
P-1754	August 2018 Crisis Cell Utilization Logs	SPA_0131-SPA_0208
P-1755	September 2018 Crisis Cell Utilization Logs	SPA_0470-SPA_0547; SPA_0209-SPA_0215
P-1756	John Barker - Incident Report	SPA_2962-SPA_2963
P-1757	John Barker - Officer Report	SPA_2964
P-1758	John Barker - Medical Records	SPA_3342-SPA_3359
P-1759	John Barker - SEIR	SPA_3341
P-1760	Jeffery Borden - Incident Report	SPA_2965-SPA_2966
P-1761	Jeffery Borden - Officer Report	SPA_2967
P-1762	Jeffery Borden - SEIR	SPA_3295
P-1780	Timothy Chumney - Incident Report	SPA_3144-SPA_3145
P-1781	Timothy Chumney - Officer Report	SPA_3146
P-1822	Ross Wolfinger - SEIR	SPA_4109
P-1823	Ross Wolfinger - Medical Records	SPA_4110-SPA_4201
P-1824	Ross Wolfinger - Incident - FCF-18-01530 302-A	SPA_4475-SPA_4476

P-1825	Ross Wolfinger - Officer Report - FCF- 18-01530 302-C	SPA_4477
P-1838	Bullock Restrictive Housing Unit Duty Post Logs / 9.30.18 – 10.6.18	ADOC0443029- ADOC0443121
P-1856	Donaldson Duty Post Logs V & W / 9.16.18- 10.5.18	ADOC0443421- ADOC0443597
P-1857	Donaldson Duty Post Logs I & J / 9.30.18- 10.5.18	ADOC0443598- ADOC0443709
P-1858	Donaldson Duty Post Logs I & J / 9.30.18- 10.5.18	ADOC0443710- ADOC0443820
P-1859	Donaldson Duty Post Logs RSTU / 9.28.18	ADOC0443821- ADOC0443920
P-1860	Donaldson Duty Post Logs RSTU / 9.16.18	ADOC0443921- ADOC0444117
P-1861	Donaldson Duty Post Logs X & Y / 10.3.18- 10.4.18	ADOC0444118- ADOC0444193
P-1862	Donaldson Duty Post Logs X & Y / 9.25.18	ADOC0444194- ADOC0444215
P-1864	Donaldson IP Group Rosters / Sept.-Oct. 2018	ADOC0444273- ADOC0444334
P-1870	Easterling Group Roster / Sept.-Oct. 2018	ADOC0444653- ADOC0444653
P-1871	Easterling Duty Post Logs Seg / 9.30.18- 10.6.18	ADOC0444654- ADOC0444730
P-1873	Easterling Group Roster / Sept.-Oct. 2018	ADOC0444734- ADOC0444735

P-1878	Fountain Duty Post Logs - Segregation / 9.30.18-10.7.18	ADOC0444755- ADOC0444819
P-1892	Holman Duty Post Logs – Seg. and Death Row/ 10.3.18-10.6.18	ADOC0444913- ADOC0444976
P-1893	Holman Duty Post Logs - Seg. and Death Row / 9.30.18-10.2.18	ADOC0444977- ADOC0445026
P-1899	Kilby Duty Post Logs N, O & P / 9.4.18- 10.7.18	ADOC0445095- ADOC0445428
P-1905	Limestone Duty Post Logs / 9.30.18-10.6.18	ADOC0445521- ADOC0445549
P-1914	St. Clair Duty Post Logs / 9.30.18-10.6.18	ADOC0445588- ADOC0445726
P-1933	Tutwiler Duty Post Logs D / 9.16.18- 10.6.18	ADOC0446031- ADOC0446137
P-1934	Tutwiler Duty Post Logs H / 9.16.18- 10.6.18	ADOC0446138- ADOC0446252
P-1935	Tutwiler Duty Post Logs L / 9.30.18- 10.6.18	ADOC0446253- ADOC0446301
P-1943	Ventress RH Prescreening, Assessments, Rounds Audit	ADOC0446358- ADOC0446360
P-1950	Donaldson MH Groups Logs / Sept.-Oct. 2018	ADOC0448090- ADOC0448097
P-1954	Easterling MH Group Logs / Sept.-Oct. 2018	ADOC0448342- ADOC0448343
P-1959	Holman MH Group Logs / Sept.-Oct. 2018	ADOC0448826- ADOC0448827
P-1965	SMI Flag Report - recent admits	ADOC0449378- ADOC0449417

P-1972	October 2018 Bibb Duty Post Logs	
P-1992	Suicide Watch Logs – October 16-31, 2018	
P-2029	Suicide Watch Report - October, 2018	
P-2066	Suicide Watch Logs – November 1-15, 2018	
P-2075	August 2018 Wexford Monthly Report	ADOC0451764- ADOC0451922
P-2076	September 2018 Wexford Monthly Report	ADOC0451923- ADOC0452080
P-2087	E-mail from Brandon Kinard to Barbara Coe, et al. re CAPS	ADOC0453594- ADOC0453614
P-2089	E-mail from Brandon Kinard to Barbara Coe, et al. re CAPS	ADOC0453618- ADOC0453638
P-2096	E-mail from Brandon Kinard to Barbara Coe, et al. re Fountain Action Plan 10.8.18	ADOC0453834- ADOC0453836
P-2099	E-mail from Brandon Kinard to Barbara Coe, et al. re St. Clair	ADOC0453959- ADOC0453961
P-2104	E-mail from Brandon Kinard to Barbara Coe re Action Plan	ADOC0456897- ADOC0456899
P-2105	E-mail from Brandon Kinard to Barbara Coe re Action Plan	ADOC0456900- ADOC0456902
P-2115	E-mail from Brandon Kinard to Barbara Coe, Meaghan Bourque re CAP for ADOC audit Holman	ADOC0457032- ADOC0457034

P-2131	E-mail from Ruth Naglich to Barbara Coe, et al. re Question about SLU	ADOC0457328- ADOC0457329
P-2132	E-mail from Brandon Kinard to Barbara Coe re Holman Action Plan	ADOC0457330- ADOC0457332
P-2133	E-mail from Barbara Coe to Ruth Naglich, et al. re SMI Screening Clarification	ADOC0457333- ADOC0457336
P-2134	E-mail from Barbara Coe to Ruth Naglich, et al. re SMI Screening Clarification	ADOC0457337- ADOC0457339
P-2135	E-mail from Barbara Coe to Brandon Kinard, et al. re SMI Screening Clarification	ADOC0457340- ADOC0457346
P-2136	E-mail from Brandon Kinard to Barbara Coe re Spot Audit CAP	ADOC0457347- ADOC0457349
P-2137	E-mail from Brandon Kinard to Barbara Coe re Spot Audit CAP	ADOC0457350- ADOC0457355
P-2142	E-mail from Barbara Coe to Brandon Kinard, Ken Dover re Corrected Spot Audit CAP	ADOC0457373- ADOC0457375
P-2143	E-mail from Lynn Brown to Barbara Coe re SMI/RH stipulations Audit	ADOC0457376- ADOC0457378
P-2169	E-mail from Barbara Coe to Nanci Warren, et al. re CAPS	ADOC0458762- ADOC0458765



P-2236	Amended Phase 2A Interim Relief Order Regarding Suicide Prevention Measures	Doc. 1106
P-2237	Interim Agreement Regarding Suicide Prevention Measures	Doc. 1106-1
P-2238	Phase 2A Order and Injunction Regarding Bibb Segregation Remedy	Doc. 1751
P-2239	Stipulations Regarding Restrictive Housing Units at Bibb County Correctional Facility	Doc. 1748-1
P-2240	Phase 2A Order and Injunction on Serious Mental Illness Flag and Mental-Health Coding	Doc. 1792
P-2241	Stipulations Regarding Mental-Health Coding and Serious Mental Illness Implementation	Doc. 1792-1
P-2242	Phase 2A Order and Injunction on Mental-Health Identification and Classification Remedy – Intake	Doc. 1794
P-2243	Stipulations Regarding Mental-Health Intake	Doc. 1794-1
P-2244	Phase 2A Order and Injunction on Segregation Remedy	Doc. 1815

P-2245	Stipulations Regarding Restrictive Housing Pre-Placement Screening, Mental-Health Rounds in Restrictive Housing and Periodic Mental-Health Assessments in Restrictive Housing	Doc. 1815-1
P-2246	Phase 2A Order and Injunction on Mental-Health Identification and Classification Remedy – Referrals	Doc.1821
P-2247	Stipulation Regarding Mental-Health Referral Process	Doc. 1821-1
P-2248	Additional Stipulations Regarding Mental-Health Referrals	Doc. 1821-2
P-2249	Phase 2A Order and Injunction on Mental-Health Individualized Treatment Planning Remedy	Doc. 1865
P-2250	Stipulations Regarding Individualized Treatment Planning	Doc. 1865-1
P-2251	Phase 2A Order and Injunction on Mental-Health Psychotherapy and Confidentiality Remedy	Doc. 1899
P-2252	Stipulations Regarding Psychotherapy	Doc.1899-1
P-2253	Phase 2A Order and Injunction on Confidentiality	Doc. 1900

P-2254	Stipulations Regarding Confidentiality	Doc. 1900-1
P-2256	Defendants' Proposed Segregation Remedial Plan	Doc. 1533
P-2257	Proposed Suicide Prevention and Crisis Care Remedial Plan	Doc. 1951
J-97	ADOC Administrative Regulation 607	
J-98	ADOC Administrative Regulation 608	
J-102	ADOC Administrative Regulation 611	
J-108	ADOC Administrative Regulation 614	
J-132	ADOC Administrative Regulation 629	
J-133	ADOC Administrative Regulation 630	

### **New Exhibits**

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2265	Nov. 2018 Combined Facility Master Rosters	Doc. 2312-2
P-2266	February and March 2018 Segregation Rosters	
P-2267	April and May 2018 Segregation Rosters	
P-2268	June and July 2018 Segregation Rosters	
P-2269	August and September 2018 Segregation Rosters	
P-2270	October and November 2018 Segregation Rosters	

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2271	December 2018 and January 2019 Segregation Rosters	
P-2272	February 2019 Segregation Roster	
P-2273	Chart of Inmates with Serious Mental Illness in Restrictive Housing as of January 22, 2019	Doc. 2306
P-2274	Report on SMI Inmates in Restrictive Housing as of January 22, 2019 and Prior RHU Placements Since January 2018 for SMI Inmates in Restrictive Housing as of January 22, 2019	Doc. 2357
P-2275	Plaintiffs' Response to Defendants' Proposed Segregation Remedial Plan	Doc. 1546
P-2276	Plaintiffs' Response to Defendants' Suicide Prevention Plan	Doc. 1966
P-2277	Feb. 8, 2019 ADOC News Release	Doc. 2368-7
P-2278	Training: Suicide Risk Assessment, Prevention & Intervention	SPA_12931-SPA_13070
P-2279	Training: Suicide Prevention	SPA_11507-SPA_11535
P-2280	Wexford Mental Health Statistics and Supporting Documents, October 2018	SPA_12618-SPA_12797
P-2281	Wexford Mental Health Statistics and Supporting Documents, November 2018	SPA_12232-SPA_12517

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2282	Wexford Mental Health Statistics and Supporting Documents, December 2018	SPA_111970-SPA_12231
P-2283	Timothy Chumney – MH004	SPA_9905-SPA_9907
P-2284	Timothy Chumney – Psychological Autopsy	SPA_10037-SPA_10043
P-2285	Jeffery Borden – MH004	SPA_10148-SPA_10151
P-2286	Jeffery Borden – Psychological Autopsy	SPA_10016-SPA_10022
P-2287	Ross Wolfinger – MH004, SEIR	SPA_10434-SPA_10437
P-2288	Ross Wolfinger – Psychological Autopsy	SPA_10030-SPA_10036
P-2289	John Barker – MH004, SEIR	SPA_10152-SPA_10158
P-2290	John Barker – Psychological Autopsy	SPA_10023-SPA_10029
P-2291	Mark Araujo – MH004, SEIR, Incident Report, Duty Officer Report, Medical Records	SPA_10205-SPA_10357
P-2292	Mark Araujo – SEIR, Mortality Review, Death Summary	SPA_10358-SPA_10362
P-2293	Mark Araujo – Psychological Autopsy	SPA_13151-SPA_13160
P-2294	Kendall Chatter – SEIR, MH004, Medical Records, Duty Officer Report	SPA_10159-SPA_10201
P-2295	Kendall Chatter – Duty Officer and Incident Reports	SPA_10442-SPA_10444
P-2296	Kendall Chatter – SEIR	SPA_10202

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2297	Kendall Chatter – Psychological Autopsy	SPA_13161-SPA_13172
P-2298	Ryan Rust – Medical Records	SPA_9795- SPA_9895
P-2299	Ryan Rust – Record Review	SPA_13188- SPA_13191
P-2300	Ryan Rust – Duty Officer and Incident Reports	SPA_10454- SPA_10456
P-2301	Ryan Rust – MH004	SPA_9896- SPA_9898
P-2302	Ryan Rust - SEIR	SPA_9899
P-2303	Ryan Rust – Psychological Autopsy	SPA_13173- SPA_13183
P-2304	Roderick Abrams – Medical Records	SPA_9540- SPA_9606
P-2305	Roderick Abrams – MH004	SPA_9791- SPA_9793
P-2306	Roderick Abrams - SEIR	SPA_9794
P-2307	Roderick Abrams – Duty Officer and Incident Reports	SPA_10451- SPA_10453
P-2308	Roderick Abrams – Record Review	SPA_13184- SPA_13187
P-2309	Paul Ford – SEIR, MH004, Medical Records	SPA_9654- SPA_9780
P-2310	Paul Ford – Duty Officer and Incident Reports	SPA_10448- SPA_10450
P-2311	Daniel Gentry – Duty Officer Report	SPA_13192
P-2312	Daniel Gentry – MH004	SPA_13193-SPA_13195
P-2313	Daniel Gentry - SEIR	SPA_13196-SPA_13197
P-2314	Daniel Gentry – Medical Records	SPA_13198-SPA_13482
P-2315	W.G. - Medical Records	SPA_12801- SPA_12929

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P-2316	W.G. – Nov. 2018 Duty Officer and Incident Reports	SPA_10460- SPA_10461
P-2317	W.G. – Nov. 2018 SEIR	SPA_10625- SPA_10626
P-2318	W.G. – Dec. 2018 Incident Report	SPA_10459
P-2319	W.G. – Dec. 2018 SEIR	SPA_9948- SPA_9949
P-2320	T.S. – Medical Records	SPA_11539- SPA_11850
P-2321	T.S. – SEIR, MH004	SPA_10438- SPA_10441
P-2322	T.S. – Duty Officer and Incident Reports	SPA_10457- SPA_10458
P-2323	Q.M. – Medical Records	SPA_10934- SPA_11503
P-2324	Q.M. – SEIR, MH004	SPA_9785- SPA_9790
P-2325	Q.M. – Duty Officer and Incident Reports	SPA_10932- SPA_10933
P-2326	J.A. – Movement History	ADOC0462746- ADOC0462749
P-2327	John Barker – Movement History	ADOC0462750- ADOC0462751
P-2328	D.C. – Movement History	ADOC0462730- ADOC0462731
P-2329	Kendall Chatter – Movement History	ADOC0462754- ADOC0462755
P-2330	J.C. – Movement History	ADOC0462752- ADOC0462753
P-2331	A.D. – Movement History	ADOC0462711- ADOC0462713
P-2332	A.F. – Movement History	ADOC0462714- ADOC0462715
P-2333	Daniel Gentry – Movement History	ADOC0462729- ADOC0462729
P-2334	D.G. - Movement History	ADOC0463734- ADOC0462736

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P-2335	D.H. – Movement History	ADOC0462727- ADOC0462728
P-2336	C.H. – Movement History	ADOC0462721- ADOC0462721
P-2337	F.J. – Movement History	ADOC0462741- ADOC0462744
P-2338	D.J. – Movement History	ADOC0462732- ADOC0462733
P-2339	Ben McClure – Movement History	ADOC0462716- ADOC0462716
P-2340	B.R.S. – Movement History	ADOC0462717- ADOC0462718
P-2341	B.S. – Movement History	ADOC0462719- ADOC0462720
P-2342	C.S. – Movement History	ADOC0462724- ADOC0462726
P-2343	J.T. – Movement History	ADOC0462745- ADOC0462745
P-2344	C.T. – Movement History	ADOC0462722- ADOC0462723
P-2345	E.W. – Movement History	ADOC0462737- ADOC0462740
P-2346	Roderick Adams – Movement History	ADOC0462894- ADOC0462895
P-2347	R.A. – Movement History	ADOC0462891- ADOC0462892
P-2348	Mark Araujo – Movement History	ADOC0462868- ADOC0462869
P-2349	M.B. – Movement History	ADOC0462871- ADOC0462872
P-2350	L.B. – Movement History	ADOC0462864- ADOC0462865
P-2351	Timothy Chumney – Movement History	ADOC0462907- ADOC0462907



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P-2352	Paul Ford – Movement History	ADOC0462881- ADOC0462882
P-2353	R.G. – Movement History	ADOC0462887- ADOC0462888
P-2354	N.G. – Movement History	ADOC0462876- ADOC0462877
P-2355	R.R.G. – Movement History	ADOC0462889- ADOC0462890
P-2356	W.G. – Movement History	ADOC0462908- ADOC0462909
P-2357	M.H. – Movement History	ADOC0462873- ADOC0462875
P-2358	R.H. – Movement History	ADOC0462893- ADOC0462893
P-2359	T.H. – Movement History	ADOC0462906- ADOC0462906
P-2360	Matthew Holmes – Movement History	ADOC0462870- ADOC0462870
P-2361	P.H. – Movement History	ADOC0462883- ADOC0462884
P-2362	N.H. – Movement History	ADOC0462878- ADOC0462880
P-2363	R.M. – Movement History	ADOC0462896- ADOC0462897
P-2364	Q.M. – Movement History	ADOC0462885- ADOC0462886
P-2365	Ryan Rust – Movement History	ADOC0462900- ADOC0462902
P-2366	T.S. - Movement History	ADOC0462903- ADOC0462905
P-2367	L.L.S. – Movement History	ADOC0462861- ADOC0462863
P-2368	L.S. – Movement History	ADOC0462866- ADOC0462867

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P-2369	Ross Wolfinger – Movement History	ADOC0462898- ADOC0462899
P-2370	January 2019 Bibb - Crisis Cell Utilization	ADOC0462756- ADOC0462761
P-2371	January 2019 Bullock - Crisis Cell Utilization	ADOC0462769- ADOC0462776
P-2372	January 2019 and September 2018 Bullock - Crisis Cell Utilization	ADOC0462762- ADOC0462768
P-2373	January 2019 Donaldson - Crisis Cell Utilization	ADOC0462780- ADOC0462786
P-2374	January 2019 Easterling - Crisis Cell Utilization	ADOC0462787- ADOC0462792
P-2375	January 2019 and December 2018 Fountain - Crisis Cell Utilization	ADOC0462793- ADOC0462803
P-2376	January 2019 Hamilton A&I - Crisis Cell Utilization	ADOC0462804- ADOC0462804
P-2377	January 2019 Holman - Crisis Cell Utilization	ADOC0462805- ADOC0462810
P-2378	January 2019 St. Clair - Crisis Cell Utilization	ADOC0462777- ADOC0462779
P-2379	January 2019 Tutwiler - Crisis Cell Utilization	ADOC0462939- ADOC0462940
P-2380	January 2019 Kilby - Crisis Cell Utilization	ADOC0462910- ADOC0462926
P-2381	January 2019 Limestone - Crisis Cell Utilization	ADOC0462927- ADOC0462927
P-2382	January 2019 Limestone - Crisis Cell Utilization	ADOC0462928- ADOC0462928
P-2383	January 2019 Limestone - Crisis Cell Utilization	ADOC0462929- ADOC0462929
P-2384	January 2019 Limestone - Crisis Cell Utilization	ADOC0462930- ADOC0462931

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P-2386	January 2019 Staton - Crisis Cell Utilization	ADOC0462932-ADOC0462933
P-2387	January 2019 Staton - Crisis Cell Utilization	ADOC0462934-ADOC0462935
P-2388	January 2019 Tutwiler - Crisis Cell Utilization	ADOC0462936-ADOC0462938
P-2389	January 2019 Ventress - Crisis Cell Utilization	ADOC0462943-ADOC0462952
P-2390	Tutwiler Segregation Duty Post Log for L-Dorm / 2.12.19 – 2.15.19	ADOC0462953-ADOC0462978
P-2391	Tutwiler Segregation Duty Post Log for L-Dorm / 2.16.19-2.18.19	ADOC0462979-ADOC0463005
P-2392	October 2018 Wexford Monthly Client Report	SPA_10784-SPA_10922
P-2393	December 2018 Wexford Monthly Client Report	SPA_10473-SPA_10603
P-2394	November 2018 Wexford Monthly Client Report	SPA_10627-SPA_10783
P-2395	CAP-Suicide Prevention	SPA_10469-10472
P-2396	Suicide Watch Report – January 2019	
P-2397	Suicide Watch Logs – January 1-15, 2019	
P-2398	Suicide Watch Logs – January 16-31, 2019	
P-2399	Suicide Watch Logs – February 1-15, 2019	
P-2400	Crisis Cells and Overflow Cells Information	SPA_4478-4479

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P-2402	Disciplinary Action – K.C.	SPA_13485-13486
P-2403	Disciplinary Action – R.W.	SPA_13487-13489
P-2404	Incident Report – D.G.	SPA_13490-13491
P-2405	K.C. Medical Records	SPA_13492-13559
P-2406	Matthew Holmes - Duty Officer Report	SPA_13560
P-2407	Matthew Holmes - Incident Report	SPA_13561-13562
P-2408	Matthew Holmes – Medical Records	SPA_13563-13612
P-2409	Suicide Watch Report – November 2018	
P-2410	Suicide Watch Logs – November 16-30, 2018	
P-2411	Suicide Watch Report – December 2018	
P-2412	Suicide Watch Logs – December 1-15, 2018	
P-2413	Suicide Watch Logs – December 16-31, 2018	
P-2414	Suicide Watch Logs - February 1-15, 2017	
P-2415	Suicide Watch Logs - March 1-15, 2017	
P-2416	Suicide Watch Logs - May 1-15, 2017	
P-2417	Suicide Watch Logs - August 1-15, 2017	
P-2418	Suicide Watch Logs - September 1-15, 2017	

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P-2420	A.D. Inst. File	ADOC0463009- ADOC0463135
P-2421	A.F. Inst. File	ADOC0463136- ADOC0463367
P-2422	C.H. Inst. File	ADOC0463368- ADOC0463499
P-2423	Joint Proposal for Preliminary Injunction Hearing Deadlines	Doc. 2369
P-2424	March 2019 Segregation Rosters	
P-2425	Bibb Segregation Duty Post Logs / 2.12.19-2.15.19	ADOC0463586- ADOC0463701
P-2426	Bibb Segregation Duty Post Logs / 2.15.19-2.18.19	ADOC0463702- ADOC0463799
P-2427	Bullock Segregation Duty Post Logs / 2.12.19 – 2.14.19	ADOC0463800- ADOC0463874
P-2428	Bullock Segregation Duty Post Logs / 2.15.19-2.18.19	ADOC0463875- ADOC0463972
P-2429	Bullock SU Duty Post Logs / 2.12.19 – 2.19.19	ADOC0463973- ADOC0464091
P-2430	Donaldson EFGH Duty Post Logs / 2.12.19	ADOC0464092- ADOC0464096
P-2431	Donaldson EFGH Duty Post Logs / 2.12.19	ADOC0464097- ADOC0464104
P-2432	Donaldson EFGH Duty Post Logs / 2.13.19	ADOC0464105- ADOC0464108
P-2433	Donaldson EFGH Duty Post Logs / 2.13.19	ADOC0464109- ADOC0464113
P-2434	Donaldson EFGH Duty Post Logs / 2.14.19	ADOC0464114- ADOC0464118

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P-2436	Donaldson EFGH Duty Post Logs / 2.15.19	ADOC0464124- ADOC0464126
P-2437	Donaldson EFGH Duty Post Logs / 2.15.19	ADOC0464127- ADOC0464132
P-2438	Donaldson EFGH Duty Post Logs / 2.16.19	ADOC0464133- ADOC0464136
P-2439	Donaldson EFGH Duty Post Logs / 2.16.19	ADOC0464137- ADOC0464140
P-2440	Donaldson EFGH Duty Post Logs / 2.17.19	ADOC0464141- ADOC0464144
P-2441	Donaldson EFGH Duty Post Logs / 2.17.19	ADOC0464145- ADOC0464149
P-2442	Donaldson EFGH Duty Post Logs / 2.18.19	ADOC0464150- ADOC0464153
P-2443	Donaldson EFGH Duty Post Logs / 2.18.19	ADOC0464154- ADOC0464157
P-2444	Donaldson I&J Duty Post Logs / 2.18.19	ADOC0464158- ADOC0464161
P-2445	Donaldson I&J Duty Post Logs / 2.18.19	ADOC0464162- ADOC0464165
P-2446	Donaldson I&J Duty Post Logs / 2.12.19	ADOC0464166- ADOC0464170
P-2447	Donaldson I&J Duty Post Logs / 2.15.19	ADOC0464171- ADOC0464174
P-2448	Donaldson I&J Duty Post Logs / 2.16.19	ADOC0464175- ADOC0464176
P-2449	Donaldson I&J Duty Post Logs / 2.17.19	ADOC0464177- ADOC0464177
P-2450	Donaldson I&J Duty Post Logs / 2.12.19	ADOC0464178- ADOC0464180
P-2451	Donaldson I&J Duty Post Logs / 2.15.19	ADOC0464181- ADOC0464183

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P-2453	Donaldson I&J Duty Post Logs / 2.17.19	ADOC0464187- ADOC0464191
P-2454	Donaldson I&J Duty Post Logs / 2.13.19	ADOC0464192- ADOC0464195
P-2455	Donaldson I&J Duty Post Logs / 2.13.19	ADOC0464196- ADOC0464199
P-2456	Donaldson I&J Duty Post Logs / 2.14.19	ADOC0464200- ADOC0464202
P-2457	Donaldson I&J Duty Post Logs / 2.13.19	ADOC0464203- ADOC0464206
P-2458	Donaldson I&J Duty Post Logs / 2.14.19	ADOC0464207- ADOC0464211
P-2459	Donaldson RSTU Duty Post Logs / 2.1.19	ADOC0464212- ADOC0464216
P-2460	Donaldson RSTU Duty Post Logs / 2.2.19	ADOC0464217- ADOC0464220
P-2461	Donaldson RSTU Duty Post Logs / 2.3.19	ADOC0464221- ADOC0464223
P-2462	Donaldson RSTU Duty Post Logs / 2.6.19	ADOC0464224- ADOC0464229
P-2463	Donaldson RSTU Duty Post Logs / 2.12.19	ADOC0464230- ADOC0464235
P-2464	Donaldson RSTU Duty Post Logs / 2.13.19	ADOC0464236- ADOC0464241
P-2465	Donaldson RSTU Duty Post Logs / 2.15.19	ADOC0464242- ADOC0464245
P-2466	Donaldson RSTU Duty Post Logs / 2.16.19	ADOC0464246- ADOC0464249
P-2467	Donaldson RSTU Duty Post Logs / 2.17.19	ADOC0464250- ADOC0464255
P-2468	Donaldson RSTU Duty Post Logs / 2.1.19	ADOC0464256- ADOC0464259

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P-2470	Donaldson RSTU Duty Post Logs / 2.3.19-2.4.19	ADOC0464264- ADOC0464267
P-2471	Donaldson RSTU Duty Post Logs / 2.6.19 – 2.7.19	ADOC0464268- ADOC0464272
P-2472	Donaldson RSTU Duty Post Logs / 2.12.19-2.13.19	ADOC0464273- ADOC0464277
P-2473	Donaldson RSTU Duty Post Logs / 2.15.19-2.16.19	ADOC0464278- ADOC0464282
P-2474	Donaldson RSTU Duty Post Logs / 2.16.19-2.17.19	ADOC0464283- ADOC0464286
P-2475	Donaldson RSTU Duty Post Logs / 2.17.19-2.18.19	ADOC0464287- ADOC0464290
P-2476	Donaldson RSTU Duty Post Logs / 1.31.19	ADOC0464291- ADOC0464296
P-2477	Donaldson RSTU Duty Post Logs / 2.4.19	ADOC0464297- ADOC0464301
P-2478	Donaldson RSTU Duty Post Logs / 2.5.19	ADOC0464302- ADOC0464307
P-2479	Donaldson RSTU Duty Post Logs / 2.14.19	ADOC0464308- ADOC0464312
P-2480	Donaldson RSTU Duty Post Logs / 2.18.19	ADOC0464313- ADOC0464318
P-2481	Donaldson RSTU Duty Post Logs / 1.31.19-2.1.19	ADOC0464319- ADOC0464322
P-2482	Donaldson RSTU Duty Post Logs / 1.31.19	ADOC0464323- ADOC0464326
P-2483	Donaldson RSTU Duty Post Logs / 2.5.19	ADOC0464327- ADOC0464330
P-2484	Donaldson RSTU Duty Post Logs / 2.13.19-2.14.19	ADOC0464331- ADOC0464334



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P-2486	Donaldson RSTU Duty Post Logs / 2.18.19	ADOC0464339- ADOC0464342
P-2487	Donaldson V&W Duty Post Logs / 2.17.19	ADOC0464343- ADOC0464346
P-2488	Donaldson V&W Duty Post Logs / 2.17.19	ADOC0464347- ADOC0464351
P-2489	Donaldson V&W Duty Post Logs / 2.18.19	ADOC0464352- ADOC0464354
P-2490	Donaldson V&W Duty Post Logs / 2.12.19	ADOC0464355- ADOC0464358
P-2491	Donaldson V&W Duty Post Logs / 2.15.19	ADOC0464359- ADOC0464362
P-2492	Donaldson V&W Duty Post Logs / 2.16.19	ADOC0464363- ADOC0464366
P-2493	Donaldson V&W Duty Post Logs / 2.12.19	ADOC0464367- ADOC0464371
P-2494	Donaldson V&W Duty Post Logs / 2.15.19	ADOC0464372- ADOC0464374
P-2495	Donaldson V&W Duty Post Logs / 2.16.19-2.17.19	ADOC0464375- ADOC0464379
P-2496	Donaldson Duty Post Logs / 2.14.19	ADOC0464380- ADOC0464385
P-2497	Donaldson V&W Duty Post Logs / 2.13.19	ADOC0464386- ADOC0464389

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P-2499	Donaldson V&W Duty Post Logs / 2.18.19	ADOC0464394- ADOC0464397
P-2500	Donaldson X&Y Duty Post Logs / 2.17.19	ADOC0464398- ADOC0464403
P-2501	Donaldson X&Y Duty Post Logs/ 2.17.19	ADOC0464404- ADOC0464407
P-2502	Donaldson X&Y Duty Post Logs / 2.17.19	ADOC0464408- ADOC0464411
P-2503	Donaldson X&Y Duty Post Logs / 2.13.19	ADOC0464412- ADOC0464412
P-2504	Donaldson X&Y Duty Post Logs / 2.12.19	ADOC0464413- ADOC0464419
P-2505	Donaldson X&Y Duty Post Logs / 2.15.19	ADOC0464420- ADOC0464425
P-2506	Donaldson X&Y Duty Post Logs / 2.16.19	ADOC0464426- ADOC0464430
P-2507	Donaldson X&Y Duty Post Logs / 2.12.19	ADOC0464431- ADOC0464437
P-2508	Donaldson X&Y Duty Post Logs / 2.15.19	ADOC0464438- ADOC0464442
P-2509	Donaldson X&Y Duty Post Logs / 2.16.19	ADOC0464443- ADOC0464444
P-2510	Donaldson X&Y Duty Post Logs / 2.13.19	ADOC0464445- ADOC0464450

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P-2511	Donaldson X&Y Duty Post Logs / 2.13.19	ADOC0464451- ADOC0464457
P-2512	Donaldson X&Y Duty Post Logs / 2.18.19	ADOC0464458- ADOC0464462
P-2513	Hamilton Seg. Duty Post Logs / 2.12.19-2.18.19	ADOC0463550- ADOC0463585
P-2514	A.D. MH Records, Feb. 2018-Feb. 2019	ADOC0466380- ADOC0466437
P-2515	A.F. MH Records, Feb. 2018-Feb. 2019	ADOC0466438- ADOC0466487
P-2516	Bullock Group Attendance Roster / Jan.-Feb. 2019	ADOC0464591- ADOC0464786
P-2517	Bullock Group Attendance Roster / Jan.-Feb. 2019	ADOC0464787- ADOC0464792
P-2518	C.H. MH Records, Feb. 2018 – Feb.2019	ADOC0466488- ADOC0466556
P-2519	D.J. Inst. File	ADOC0465630- ADOC0465874
P-2520	D.J. MH Records, Feb. 2018-Feb. 2019	ADOC0466557- ADOC0466670
P-2521	D.G. Inst. File	ADOC0464998- ADOC0465161
P-2522	D.G. MH Records, Feb. 2018-Feb. 2019	ADOC0466671- ADOC0466888
P-2523	Depression and Anxiety Group Logs / Jan.-Feb. 2019	ADOC0464990- ADOC0464997

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P-2524	Donaldson Group Attendance Roster / Jan.- Feb. 2019	ADOC0464793- ADOC0464820
P-2525	Donaldson Group Attendance Roster / Jan.- Feb. 2019	ADOC0464821- ADOC0464833
P-2526	Donaldson RTU Group Log / Jan.-Feb. 2019	ADOC0464834- ADOC0464857
P-2527	Easterling Grief and Loss Group Roster / Feb. 2019	ADOC0464876- ADOC0464885
P-2528	Easterling Group Attendance Roster / Jan.- Feb. 2019	ADOC0464858- ADOC0464875
P-2529	Easterling Group Attendance Roster / Jan. 2019	ADOC0464886- ADOC0464903
P-2530	F.J. Inst. File	ADOC0465162- ADOC0465315
P-2531	Hamilton Group Attendance Roster / Jan.- Feb. 2019	ADOC0464904- ADOC0464915
P-2532	Hamilton Group Attendance Roster / Dec. 2018-Feb. 2019	ADOC0464916- ADOC0464938
P-2533	Holman Group Attendance Roster / Jan.-Feb. 2019	ADOC0464939- ADOC0464940
P-2534	J.A. Inst. File	ADOC0465316- ADOC0465629
P-2535	Kilby - Group Attendance Roster / Jan.-Feb. 2019	ADOC0464463- ADOC0464482
P-2536	L.S. Inst. File	ADOC0465875- ADOC0466060

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P-2537	Limestone Group Attendance Roster/ Feb. 2019	ADOC0464941- ADOC0464984
P-2538	Limestone Group Attendance Roster / Feb. 2019	ADOC0464985- ADOC0464985
P-2539	Paul Ford Inst. File	ADOC0466061- ADOC0466175
P-2540	Q.M. Inst. File	ADOC0466176- ADOC0466379
P-2541	St. Clair Group Attendance Roster / Feb. 2019	ADOC0464986- ADOC0464989
P-2542	Tutwiler Group Attendance Roster / Jan.-Feb. 2019	ADOC0464483- ADOC0464590
P-2543	Easterling Seg. Duty Post Logs / 2.12.19	ADOC0466889- ADOC0466901
P-2544	Easterling Seg. Duty Post Logs / 2.13.19	ADOC0466902- ADOC0466915
P-2545	Easterling Seg. Duty Post Logs / 2.14.19	ADOC0466916- ADOC0466921
P-2546	Easterling Seg. Duty Post Logs / 2.14.19	ADOC0466922- ADOC0466937
P-2547	Easterling Seg. Duty Post Logs / 2.15.19	ADOC0466938- ADOC0466954
P-2548	Easterling Seg. Duty Post Logs / 2.16.19	ADOC0466955- ADOC0466966
P-2549	Easterling Seg. Duty Post Logs / 2.17.19	ADOC0466967- ADOC0466976

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P-2550	Easterling Seg. Duty Post Logs / 2.18.19	ADOC0466977- ADOC0466993
P-2551	Fountain Seg. Duty Post Logs / 2.12.19-2.18.19	ADOC0466994- ADOC0467048
P-2552	Fountain Seg. Duty Post Logs / 8.16.18-8.22.18	ADOC0467049- ADOC0467077
P-2553	F.J. MH Records, Feb. 2018-Feb. 2019	ADOC0468005- ADOC0468134
P-2554	Holman H Duty Post Logs / 5.28.18-6.3.18	ADOC0467078- ADOC0467155
P-2555	Holman H Duty Post Logs / 12.15.18-12.21.18	ADOC0467156- ADOC0467187
P-2556	Holman Seg. and Death Row Duty Post Logs / 2.12.19-2.18.19	ADOC0467188- ADOC0467276
P-2557	J.A. Medical Records, Feb. 2018-Feb. 2019	ADOC0468135- ADOC0468278
P-2558	Kilby Seg. Duty Post Logs / 1.10.19-1.16.19	ADOC0467277- ADOC0467302
P-2559	Kilby MNOP Duty Post Logs / 2.16.19-2.18.19	ADOC0467303- ADOC0467355
P-2560	Kilby MNOP Duty Post Logs / 2.12.19-2.15.19	ADOC0467356- ADOC0467411
P-2561	L.S. MH Records, Feb. 2018-Feb. 2019	ADOC0468279- ADOC0468391
P-2562	Limestone Seg. Duty Post Logs / 2.12.19-2.18.19	ADOC0467412- ADOC0467521

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2563	Limestone Seg. Duty Post Logs / 2.8.19-2.14.19	ADOC0467522- ADOC0467561
P-2564	Limestone Seg. Duty Post Logs / 11.17.18-11.23.18	ADOC0467562- ADOC0467598
P-2565	Limestone Seg. Duty Post Logs / 12.25.18-12.31.18	ADOC0467599- ADOC0467634
P-2566	R.G. MH Records, Feb. 2018-Feb. 2019	ADOC0468392- ADOC0468418
P-2567	R.R.G. Records, Feb. 2018-Feb. 2019	ADOC0468419- ADOC0468530
P-2568	St. Clair Seg. Duty Post Logs / 2.12.19-2.14.19	ADOC0467635- ADOC0467661
P-2569	St. Clair Seg. Duty Post Logs / 2.15.19-2.18.19	ADOC0467662- ADOC0467711
P-2570	St. Clair Seg. Duty Post Logs / 12.27.18-1.2.19	ADOC0467712- ADOC0467739
P-2571	St. Clair Seg. Duty Post Logs / 12.27.18-12.31.18	ADOC0467740- ADOC0467777
P-2572	Staton G Dorm Duty Post Logs / 11.19.18-11.25.18	ADOC0467778- ADOC0467813
P-2573	Ventress Seg. Duty Post Logs / 2.12.19-2.15.19	ADOC0467814- ADOC0467888
P-2574	Ventress Seg. Duty Post Logs / 2.15.19-2.19.19	ADOC0467889- ADOC0467969
P-2575	Ventress Seg. Duty Post Logs / 11.29.18-12.6.18	ADOC0467970- ADOC0468004

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2576	Bullock H Unit Roster	ADOC0468531- ADOC0468531
P-2577	2.15.2019 Email from Daniels to Ellington	ADOC0468546- ADOC0468546
P-2578	Donaldson V&W Duty Post Logs / 2.13.19	ADOC0468548- ADOC0468551
P-2579	Donaldson X&Y Duty Post Logs / 2.14.19	ADOC0468552- ADOC0468557
P-2580	Donaldson X&Y Duty Post Logs / 2.14.19	ADOC0468558- ADOC0468563
P-2581	Donaldson Z Duty Post Logs / 2.12.19-2.19.19	ADOC0468564- ADOC0468642
P-2582	Donaldson RTU, SLU, BMU Rosters	ADOC0468532- ADOC0468539
P-2583	2.6.19 Email from Ellington to Daniels	ADOC0468544- ADOC0468544
P-2584	2.15.19 Email from Ellington to Daniels	ADOC0468543- ADOC0468543
P-2585	2.15.19 Email from Ellington to Daniels	ADOC0468547- ADOC0468547
P-2586	R.G. Inst. File	ADOC0468765- ADOC0468842
P-2587	R.R.G. Inst. File	ADOC0468843- ADOC0468948
P-2588	Kilby C&D Duty Post Logs / 2.12.19	ADOC0468643- ADOC0468652



<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2589	Kilby CDEFL Duty Post Logs / 2.13.19	ADOC0468653- ADOC0468661
P-2590	Kilby CDEFL Duty Post Logs / 2.14.19	ADOC0468662- ADOC0468670
P-2591	Kilby CDEFL Duty Post Logs / 2.15.19	ADOC0468671- ADOC0468679
P-2592	Kilby CDEFL Duty Post Logs / 2.16.19	ADOC0468680- ADOC0468691
P-2593	Kilby CDEFL Duty Post Logs / 2.17.19	ADOC0468692- ADOC0468700
P-2594	Kilby CDEFL Duty Post Logs / 2.18.19	ADOC0468701- ADOC0468709
P-2595	Kilby Seg-Like Rosters	ADOC0468540- ADOC0468542
P-2596	2.15.19 Email from Naglich to Daniels	ADOC0468545- ADOC0468545
P-2597	State's Answers to Plaintiffs' Interrogatories re Motion for Preliminary Injunction	
P-2598	Tutwiler Seg. Duty Post Logs / 11.22.18-11.23.18	ADOC0468710- ADOC0468722
P-2599	Tutwiler Seg. Duty Post Logs / 11.24.18-11.25.18	ADOC0468723- ADOC0468738
P-2600	Tutwiler Seg. Duty Post Logs / 11.26.18-11.28.18	ADOC0468739- ADOC0468756

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2601	Tutwiler Seg. Duty Post Logs / 11.28.18-11.29.18	ADOC0468757- ADOC0468764
P-2602	Ross Wolfinger Inst. File	ADOC0468949- ADOC0469042
P-2603	Report and Recommendations on Suicide Prevention in the Alabama Department of Corrections	Doc. 2416-1
P-2604	Appendix - Suicide Record Reviews	Doc. 2416-2
P-2605	Sample Staff Referral Form	Doc. 2416-3
P-2606	Supplemental Recommendations on Suicide Prevention in the Alabama Department of Corrections	Doc. 2416-4
P-2607	September 2018 ADOC Monthly Statistical Report	
P-2608	November 2018 ADOC Monthly Statistical Report	Doc. 2418-2
P-2609	ADOC-Wexford MH CQI Presentation - JAB changes 2-22-19	SPA_13615-SPA_13629
P-2610	Advanced Suicide Prevention Sign-In Sheet	SPA_13630-SPA_13632
P-2611	BIBB February Self-Audit	SPA_13633-SPA_13633
P-2612	BIBB NOVEMBER Self-Audit	SPA_13634-SPA_13634
P-2613	BULLOCK February Self-Audit	SPA_13635-SPA_13635
P-2614	BULLOCK NOVEMBER MH Self-Audit	SPA_13636-SPA_13636

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2615	Combined Mental Health Audit Tool MASTER	SPA_13637-SPA_13639
P-2616	Copy of Copy of HOLMAN February Self-Audit	SPA_13640-SPA_13640
P-2617	Copy of DONALDSON February Self-Audit	SPA_13641-SPA_13641
P-2618	Copy of EASTERLING February Self-Audit	SPA_13642-SPA_13642
P-2619	Copy of VENTRESS February Self-Audit	SPA_13643-SPA_13643
P-2620	DONALDSON NOVEMBER MH Self-Audit	SPA_13644-SPA_13644
P-2621	Easterling - Suicide Crisis CAP	SPA_13645-SPA_13652
P-2622	EASTERLING February Self-Audit	SPA_13653-SPA_13653
P-2623	EASTERLING MH NOVEMBER SELF-AUDIT	SPA_13654-SPA_13654
P-2624	February 19 Training	SPA_13655-SPA_13692
P-2625	FOUNTAIN February Self-Audit	SPA_13693-SPA_13693
P-2626	FOUNTAIN NOVEMBER Self-Audit	SPA_13694-SPA_13694
P-2627	HAMILTON February Self-Audit	SPA_13695-SPA_13695
P-2628	HAMILTON NOVEMBER MH Self-Audit	SPA_13696-SPA_13696
P-2629	HOLMAN NOVEMBER MH Self-Audit	SPA_13697-SPA_13697
P-2630	KILBY February Self-Audit	SPA_13698-SPA_13698

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2631	KILBY NOVEMBER Self-Audit	SPA_13699-SPA_13699
P-2632	Limestone - Suicide Prevention CAP	SPA_13700-SPA_13709
P-2633	LIMESTONE February Self-Audit	SPA_13710-SPA_13710
P-2634	LIMESTONE NOVEMBER Self-Audit	SPA_13711-SPA_13711
P-2635	Matthew Holmes - (SEIR)	SPA_13614-SPA_13614
P-2636	St. Clair February Self-Audit	SPA_13712-SPA_13712
P-2637	St. CLAIR NOVEMBER MH Self-Audit	SPA_13713-SPA_13713
P-2638	STATON-ELMORE February Self-Audit	SPA_13714-SPA_13714
P-2639	STATON-ELMORE NOVEMBER MH Self-Audit	SPA_13715-SPA_13715
P-2640	Suicide Prevention Measures Audit Tool FINAL	SPA_13716-SPA_13716
P-2641	Suicide Prevention Measures SELF-AUDIT STATEWIDE TOTALS	SPA_13717-SPA_13718
P-2642	Suicide Watch Tools v.02.27.2019	SPA_13719-SPA_13720
P-2643	TUTWILER February Self-Audit	SPA_13721-SPA_13721
P-2644	TUTWILER NOVEMBER MH Self-Audit	SPA_13722-SPA_13722
P-2645	VENTRESS NOVEMBER Self-Audit	SPA_13723-SPA_13723
P-2646	CO M.H. Written Reprimand	SPA_13724-SPA_13725

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2647	Suicide Attempts	SPA_13726-SPA_13727
P-2648	February 2019 Suicide Prevention Report	
P-2649	February 16-28, 2019 Suicide Monitoring Logs	
P-2650	Phase 2A Order re Segregation Remedy	Doc. 1720
P-2651	Amended Stipulation Regarding Phase 2A Mental Health Consultation to the Disciplinary Process	Doc. 2384-1
P-2652	Administrative Regulation 403	Doc. 2384-2
P-2653	Amended Stipulation Regarding the Provision of Hospital-Level Care	Doc. 2383-1
P-2654	Administrative Regulation 640	Doc. 2383-2
P-2655	Phase 2A Order and Injunction on Mental-Health Understaffing	Doc. 2301
P-2656	Declaration of Cheryl Price	Doc. 2301-1
P-2657	Wexford Health Behavioral Health Services Guidelines	SPA_0815- SPA_0920; ADOC0422288- ADOC0422393
P-2658	NCCHC Standards for Health Services in Prison	
P-2659	T.L. MH Records, Jan. 2018-Jan. 2019	SPA_11856-SPA_11969
P-2660	Duty Officer Report - suicide of Matthew Holmes	
P-2661	Duty Officer Report - suicide of Rashaud Morrissette	

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2662	Holman Seg. Duty Post Logs / 12.15.18-12.21.18	ADOC0469154- ADOC0469209
P-2663	Duty Officer Report - J.B.	
P-2664	Incident Report – Suicide Attempt of J.B.	
P-2665	J.B. Inst. File	ADOC0469443- ADOC0470537
P-2666	Duty Officer Report – Suicide Attempt of J.H.	
P-2667	J.H. Classification Summary	ADOC0469212- ADOC0469440
P-2668	Incident Report – Suicide Attempt of J.H.	
P-2669	Incident Report – Suicide of Matthew Holmes	ADOC0470539- ADOC0470540
P-2670	Incident Report – Suicide of Rashaud Morrissette	ADOC0470541- ADOC0470541
P-2671	Notice of Filing and SMI-RHU Report for 03/19/2019	Doc. 2432
P-2672	Psychological Autopsy - Paul Ford	ADOC0470543- ADOC0470554
P-2673	Psychological Autopsy - Roderick Abrams	ADOC0470555- ADOC0470564
P-2674	Donaldson Seg. and Death Row Duty Post Logs / 2.22.19-3.1.19	ADOC0470615- ADOC0470684

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2675	Holman Seg. and Death Row Correctional Facility Duty Post Logs / 2.22.19-3.1.19	ADOC0470685- ADOC0470787
P-2676	St. Clair A Unit Duty Post Logs / 2.22.19-3.1.19	ADOC0470788- ADOC0470829
P-2677	Staton G Dorm Duty Post Logs / 2.22.19-3.1.19	ADOC0470830- ADOC0470874
P-2678	Matthew Holmes Inst. File	ADOC0470875- ADOC0472067
P-2679	Hayes Suicide Resistance Checklist	
P-2680	C.H. MH Records, March 1, 2018 – March 1, 2019	ADOC0472269- ADOC0472551
P-2681	D.M. MH Records, March 1, 2018-March 1, 2019	ADOC0472552- ADOC0472871
P-2682	D.B. MH Records, March 1, 2018-March 1, 2019	ADOC0472872- ADOC0473132
P-2683	M.B. MH Records, March 1, 2018-March 1, 2019	ADOC0473368- ADOC0473625
P-2684	J.D. MH Records, March 1, 2018-March 1, 2019	ADOC0473133- ADOC0473367
P-2685	Tutwiler DR Duty Post Logs 2.22.19-3.1.19	ADOC0472068- ADOC0472103
P-2686	Tutwiler DR Duty Post Logs 2.22.19-3.1.19	ADOC0472104- ADOC0472139

<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2687	Tutwiler D Duty Post Logs 2.22.19-2.28.19	ADOC0472140- ADOC0472181
P-2688	Tutwiler RTU Duty Post Logs 2.22.19-3.1.19	ADOC0472182- ADOC0472213
P-2689	Tutwiler SU Duty Post Logs 2.22.19-3.1.19	ADOC0472214- ADOC0472268
P-2690	Joint Notice of Filing the Amended Stipulation Regarding the Provision of Hospital-Level Care	Doc. 2383
P-2691	Rashaud Morrissette Institutional File	ADOC0473626- ADOC0473679
P-2692	Rashaud Morrissette Mental Health Records	ADOC0473680- ADOC0473708
P-2693	Rashaud Morrissette Inmate Movement History	ADOC0473709- ADOC0473709
P-2694	Matthew Holmes Mental Health Records	ADOC0473710- ADOC0473747
P-2695	Matthew Holmes Quality Improvement Program: Review of Inmate Suicide or Life- Threatening Attempt	ADOC0473748- ADOC0473751
P-2696	Duty Officer Report Attempted Suicide of C.T.	ADOC0473752- ADOC0473752
P-2697	Incident Report Attempted Suicide of C.T.	ADOC0473753- ADOC0473753



<b>Ex. No.</b>	<b>Title</b>	<b>Bates / Docket Number</b>
P-2698	C.T. Institutional File	ADOC0473754- ADOC0475371
P-2699	C.T. Mental Health Records	ADOC0475372- ADOC0475403
P-2700	C.T. Inmate Movement History	ADOC0475404- ADOC0475405
P-2701	J.H. Medical Records	ADOC0475406- ADOC0475504
P-2702	J.H. Inmate Movement History	ADOC0475505- ADOC0475505
P-2703	J.H. Suicide Attempt Report	ADOC0475506- ADOC0475506
P-2704	J.B. Mental Health Records	ADOC0475507- ADOC0475550
P-2705	J.B. Inmate Movement History	ADOC0475551- ADOC0475552
Any exhibit necessary for impeachment or rebuttal.		
Any exhibit identified by Defendants, and any exhibit previously marked by either Party in this matter.		

Dated: March 26, 2019

Respectfully Submitted,

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