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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

TERRI CARLISLE,

Plaintiff,

v.

DOUGLAS COUNTY, Oregon; CORRECT
CARE SOLUTIONS, LLC; JOHN
HANLIN; MIKE ROOT; STEVEN BLUM,
M.D.; NURSE DOE; MEDICAL
ASSISTANT DOE; CORRECTIONAL
OFFICER DOE(S),

Defendants.

NO.

COMPLAINT

Civil Rights Action (42 U.S.C. § 1983) and
Negligence

DEMAND FOR JURY TRIAL

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PRELIMINARY STATEMENT

1. Plaintiff Terri Carlisle brings this suit under 42 U.S.C. § 1983 for violation of her civil rights under the Eighth Amendment to the United States Constitution, and for related state common law tort claims.

2. Ms. Carlisle was incarcerated at Douglas County Jail from February 9, 2015 to August 4, 2015. For over two months, Ms. Carlisle was denied her neuropathy medication by jail and medical staff, who were fully aware of her serious medical needs. As a result of this denial, Ms. Carlisle suffered constant and severe pain, Restless Leg Syndrome, anxiety and had difficulty sleeping more than three or four hours a night.

3. Jail staff also subjected Ms. Carlisle to inhumane cell conditions while she was confined in disciplinary housing for six days. A single, small cell served as the disciplinary and booking unit, estimated to be twelve feet by twelve feet. The cell had approximately nine cots stacked inside, with a single toilet and water source. There were no sheets or pillows. The women held in the cell were each given a single blanket.

4. While Defendant Hanlin's staff housed Ms. Carlisle in that cell, it was occupied by up to twelve women. Some of those women were menstruating but were not given necessary hygiene products. At least one woman had an open sore, but received no medical attention. Another woman was vomiting in and around the single toilet in the cell. Another woman had diarrhea. There was not enough toilet paper for these women to share. The cell had a foul odor and was very hot. Food was distributed in the cell and had to be eaten there. The food often included a round scoop of meat product that also had a foul odor. Ms. Carlisle was not allowed to shower for the entire six days she spent in that cell. She was not allowed out of that cell for any time during the six days.

5. Ms. Carlisle seeks economic and noneconomic damages for pain and suffering caused by Defendants' actions, as well as punitive damages for Defendants' reckless indifference to her Eighth Amendment rights. Ms. Carlisle also seeks injunctive relief and reasonable attorney fees and costs.

JURISDICTION

6. This Court has original jurisdiction over Plaintiff's claims pursuant to 28 U.S.C. § 1331 because the causes of action arise under the Constitution and laws of the United States, thereby satisfying federal question jurisdiction. This Court has supplementary jurisdiction over Plaintiff's related state law claims pursuant to 28 U.S.C. § 1367.

VENUE

7. Venue is proper as to all Defendants pursuant to 28 U.S.C. § 1391 because all the events giving rise to the claims occurred within the District of Oregon. All parties also reside in Oregon.

8. Assignment to the Eugene Division is proper under District of Oregon LR 3-2 Divisions of Court because Ms. Carlisle and Douglas County Jail are located in Douglas County, which falls within the divisional venue of the Eugene Division.

PARTIES

9. Plaintiff Terri Carlisle is a resident of Douglas County who was incarcerated in Douglas County Jail from February 9, 2015 to August 4, 2015, and whose rights were violated under the United States Constitution during that period.

10. Defendant Douglas County is a political subdivision of the State of Oregon, with the capacity to sue and be sued. Douglas County Sheriff's Department operates the

Douglas County Jail and is a subdivision of Douglas County's municipal government.

Douglas County is sued because of its ultimate control over Douglas County Sheriff's Department and the Douglas County Jail where Ms. Carlisle was incarcerated.

11. Defendant Correct Care Solutions ("CCS"), a Limited Liability Corporation incorporated in Kansas and headquartered in Nashville, Tennessee, is the company Douglas County Jail contracts with to provide medical care for the inmates in the jail facility. Defendant CCS was responsible for Ms. Carlisle's medical care during her incarceration.

12. Defendant John Hanlin is the Douglas County Sheriff and was serving his second term at the time of the events giving rise to this lawsuit. Defendant Hanlin has full authority over and responsibility for the Douglas County Jail. He is sued in his official and individual capacity.

13. Defendant Lieutenant Mike Root is the Corrections Lieutenant at Douglas County Jail who was the head of corrections during Ms. Carlisle's incarceration. He is sued in his official and individual capacity.

14. Defendant Dr. Steven Blum was the physician responsible for providing medical care to inmates incarcerated in Douglas County Jail during Ms. Carlisle's incarceration. Upon information and belief, he was employed by CCS and under contract to Douglas County. He is sued in his individual capacity.

15. Defendant Nurse Doe was the nurse who assisted in providing medical care to Ms. Carlisle while she was incarcerated in Douglas County Jail. Upon information and belief, she was employed by CCS and under contract to Douglas County. She is sued in her individual capacity.

16. Defendant Medical Assistant Doe was a medical assistant who assisted in providing medical care to Ms. Carlisle while she was incarcerated in Douglas County Jail. Upon information and belief, he was employed by CCS and under contract to Douglas County. He is sued in his individual capacity.

17. Defendant Correctional Officer Doe(s) were employed by Douglas County and worked for the Sheriff's Office at the time of Ms. Carlisle's incarceration and interacted with her on a daily basis. Defendants are sued in their official and individual capacities.

18. At all material times, all defendants were acting under color of law.

STATEMENT OF FACTS

Ms. Carlisle's Cruel and Unusual Treatment in Douglas County Jail

19. Ms. Carlisle submitted to the custody of Douglas County Jail on February 9, 2015 for three Driving Under the Influence of Intoxicants charges for which she was sentenced to 6 months in jail.

20. Ms. Carlisle suffers from peripheral neuropathy. She was first diagnosed with peripheral neuropathy approximately 10 years prior to her incarceration. Peripheral neuropathy results from damage to peripheral nerves, often causing numbness and severe pain, usually in the hands and feet.

21. For approximately 10 years prior to her incarceration, Ms. Carlisle had been prescribed Neurontin, a brand of gabapentin. For gabapentin to be the most effective, it needs to be taken at regular and consistent intervals. This keeps the levels of the medication in the body constant. Ms. Carlisle's doctor instructed her to take the

medication four times a day every six hours. Without the medication, Ms. Carlisle suffers needless pain. Ms. Carlisle consistently took her medication as directed.

22. Defendants Douglas County, CCS, Sheriff Hanlin, Lieutenant Root, Dr. Blum, Nurse Doe, Medical Assistant Doe, and Correctional Officer Doe(s) (the “Douglas County Jail Defendants”) were put on notice of Ms. Carlisle’s medical condition and associated medication prescription on or about the time she entered Douglas County Jail. As part of the intake process, Ms. Carlisle signed a release authorizing the jail to access her outside medical records. These records were faxed to the jail medical staff, operated by Defendant CCS, by her doctor, Dr. Lynn Jorgenson, on or around February 10, 2015.

23. On or around February 10, 2015, Defendant CCS created a file for Ms. Carlisle that included copies of her medical records. This file established Ms. Carlisle’s medical history, including information regarding her neuropathy diagnosis and prescribed Neurontin.

24. On or about February 12, 2015, Defendant Dr. Blum approved an order for Ms. Carlisle to receive 300 mg of gabapentin four times daily.

25. Defendants initially provided Ms. Carlisle with her medication as prescribed. Although Ms. Carlisle needed to take a total of four pills each day, upon information and belief, jail staff instead made the decision to administer two pills twice daily. For the first three months, Ms. Carlisle was given two doses of gabapentin twice daily during scheduled jail medication distribution times: two pills in the morning and two pills at night. The jail entrusted her to take one dose immediately upon receipt and then take the second dose six hours later per her doctor’s instructions. Ms. Carlisle would take her morning pill immediately and bring her noon pill with her on work crew in order to

take it at the appropriate time. She would then take the remaining two pills at six hour intervals, one at dinner and the other before bed.

26. The first half of Ms. Carlisle's incarceration was without incident. She took advantage of the limited programming available at Douglas County Jail. She was cleared for "work crew" and would perform manual labor for approximately 8 hours a day. She received no disciplinary charges. And despite random cell sweeps and routine strip searches upon return from work crew outings, she was never found stowing away medication or other unauthorized items.

27. On or about the morning of May 31, 2015, Ms. Carlisle received two doses of gabapentin from jail staff. She took the first dose in her cell. She mistakenly did not take the second dose six hours later. To minimize interference with her strict dosing schedule, Ms. Carlisle's doctor had previously instructed her not to take a skipped dose late or in conjunction with another dose. Instead, she was instructed to simply wait until the next dosing period to take the medication again. Consistent with those prior directions, Ms. Carlisle waited until the next dosing period to take her medication. Ms. Carlisle placed the missed dose with her personal belongings inside her cell.

28. On or about the evening of May 31, 2015, correctional officers swept Ms. Carlisle's and her three cellmates' unit and belongings. They found Ms. Carlisle's missed gabapentin dose. Lieutenant Tamara Case's Incident Report also notes Ms. Carlisle had a pencil sharpener, pair of fingernail clippers, salt in the finger of a glove, ibuprofen and "DSS"¹ tablets. Lieutenant Case noted that the medication was given to medical and

¹ Upon information and belief, this is a reference to docusate, a tablet taken to soften stool to aid with constipation.

recommended that “Hunt² be removed from work crew and spend three days in holding” for possession of contraband.

29. Upon information and belief, Ms. Carlisle tried to explain why she had her medication in her cell, but the officers refused to listen. Instead, jail staff issued Ms. Carlisle five rule violations: 1) Conduct that Disrupts Orderly Jail Function, 2) Possessing Unauthorized Clothing, 3) Worker Removal for Cause, 4) Misuse of Authorized Medication, and 5) Possession of Contraband.

30. As punishment for her charges, Ms. Carlisle was sent to the jail’s booking cell, which doubled as disciplinary housing. Each of the five violations carried the same “findings” that Ms. Carlisle would be subject to “no work during this incarceration, remain in holding for three days and no visits or commissary for one week.” Defendants confined Ms. Carlisle in disciplinary holding for six days.

31. While in disciplinary holding, Ms. Carlisle was confined to in a small cell with up to twelve other female inmates. The cell was estimated to be about twelve feet by twelve feet. It had a foul odor and was very hot. The cell had approximately nine cots stacked inside, with a single water source and toilet. The cots did not have sheets or pillows, only a single wool blanket. Some of the women in the cell were menstruating and not given hygiene products. At least one woman had open sores, but was not given medical attention. Another woman was vomiting in and around the single toilet. Another woman had diarrhea. The women had to wait at least an hour when they requested toilet paper. Food was distributed in the cell and had to be eaten there. The food often included a round scoop of meat product that also had a foul odor. Ms. Carlisle was not allowed to

² It is unclear who “Hunt” refers to in the incident report referenced herein.

shower for the entire six days she spent in that cell. She was also not allowed out of the small cell at any time during those six days.

32. After May 31, 2015, Ms. Carlisle repeatedly requested her medication from jail personnel.

33. Despite her requests and that of her physician, Defendants refused to administer the gabapentin after May 31, 2015. Within thirty-six hours of the discontinuation of her medication, Ms. Carlisle's neuropathy symptoms flared, causing constant burning and stabbing pain in her feet and toes, as well as the onset of withdrawal symptoms such as nausea, sweating, anxiety, restless legs and difficulty sleeping. The pain in Ms. Carlisle's feet would sometimes surge with a sharp, stabbing pain as she stepped down causing her to lose her balance and have difficulty walking.

34. Abruptly stopping gabapentin is dangerous. Typically, doctors gradually wean patients off of gabapentin because of safety concerns. In addition to withdrawal symptoms experienced by Ms. Carlisle, abruptly stopping the medication also put her at risk for unexpected seizures and related injuries.

35. Both during and after disciplinary confinement, jail and medical personnel refused to provide Ms. Carlisle with her medication as punishment for the hoarding.

36. Ms. Carlisle complained to jail and medical staff about not receiving her medication both formally and informally.

37. On or around June 4, 2015, Ms. Carlisle submitted a health request "kite" stating, "For four days I have been miserable with stabbing burning foot neuropathy. I am asking you to please re-issue my Neurontin. Thank you." On or around June 8, 2015,

Defendant Dr. Steven Blum responded “Dr. review. We cannot restart that because of hoarding.” No medical consideration or justification was noted.

38. Ms. Carlisle contacted her doctor in the community. On June 22, 2015, Dr. Jorgensen faxed a letter to Douglas County Jail stating that Ms. Carlisle was his patient and that “[f]or medical reasons, the above named patient needs to take her Neurontin medication as directed.” Defendant Dr. Steven Blum initialed the letter on June 30, 2015, yet continued to refuse Ms. Carlisle’s requests for her medication.

39. On or around July 9, 2015, Ms. Carlisle again demanded reinstatement of her prescribed neuropathy medication.

40. Ms. Carlisle was refused neuropathy medication for the remainder of her incarceration, approximately 65 days. She experienced constant burning and stabbing pain in her feet and toes for that period. The constant pain made it difficult for her to walk, sometimes causing her to lose her balance. She also experienced disruptive Restless Leg Syndrome (RLS).

41. When she was taking gabapentin regularly, Ms. Carlisle usually slept six to eight hours per night. After being denied her medication, she only slept three to four hours per night for the remainder of her incarceration. This was due to the burning in her feet, the high degree of restlessness in her legs that caused uncontrollable twitching, and the tense feeling of her anxiety.

42. Jail personnel’s refusal to administer gabapentin caused Ms. Carlisle to suffer emotionally in the form of significant anxiety that caused her to feel sweaty, nauseas, tense and nervous throughout the days and nights.

FIRST CLAIM FOR RELIEF

8th Amendment Failure to Provide Medically Necessary Care-42 U.S.C. § 1983

(as to Defendants Blum and Does)

43. Plaintiff realleges paragraphs 1-42.

44. Plaintiff's neuropathy is a serious medical condition.

45. The individual Defendants were deliberately indifferent to Ms. Carlisle's serious medical need when they withheld necessary medical treatment for disciplinary reasons. Defendants discontinued and refused to provide medication or other treatment for her neuropathy pain as punishment for alleged medication hoarding, a rationale wholly divorced from any medical judgment or justification. They were thus deliberately indifferent to a serious risk that Ms. Carlisle would experience unnecessary pain and suffering, as well as serious and potentially dangerous withdrawal symptoms.

46. As a result of Defendants' deliberate indifference, Defendants violated Ms. Carlisle's right to be free from cruel and unusual punishment under the Eighth Amendment of the United States Constitution.

47. As a result of Defendants' violation of Ms. Carlisle's constitutional rights, for many months Ms. Carlisle experienced physical pain and suffering and emotional pain in the form of increased anxiety. Accordingly, Plaintiff is entitled to economic and noneconomic damages against Defendants in an amount to be determined at trial for violation of 42 U.S.C. § 1983.

48. Defendants' actions were also recklessly indifferent to Ms. Carlisle's Eighth Amendment rights and callously disregarded Ms. Carlisle's pain and safety, and punitive

damages should be awarded against the Defendants in an amount to be determined at trial for violation of 42 U.S.C. § 1983.

49. Ms. Carlisle is entitled to attorney fees and costs pursuant to 42 U.S.C. § 1988.

SECOND CLAIM FOR RELIEF

Claims-8th Amendment Inhumane Conditions-42 U.S.C. § 1983

(as to Defendants Hanlin, Root, Officer Doe(s))

50. Plaintiff realleges paragraphs 1-42.

51. Defendants were deliberately indifferent to conditions that resulted in Ms. Carlisle experiencing serious deprivations of her basic human needs and denial of the minimum civilized measure of life's necessities in violation of her Eighth Amendment right to be free from cruel and unusual punishment. These conditions include, but are not limited to, the following:

a. Confining Ms. Carlisle to a small, crowded, hot, foul-smelling cell with up to twelve other women, some of whom had open and visible sores, were vomiting and had diarrhea.

b. Refusing to provide basic hygiene products to Ms. Carlisle and the women confined in the disciplinary/booking cell, including but not limited to products for the management of menstruation and toilet paper.

c. Requiring Ms. Carlisle and other prisoners to eat food that was unfit for human consumption in close, unhygienic quarters that were also used for bathroom facilities.

d. Refusing to allow Ms. Carlisle to shower or leave the cell and conditions described above for six days.

52. As a direct result of Defendants' actions and inactions, Defendants deprived Ms. Carlisle of her right to be free from cruel and unusual punishment under the Eighth Amendment of the United States Constitution.

53. As a result of Defendants' violation of Ms. Carlisle's constitutional rights, for many months Ms. Carlisle experienced physical pain and suffering and emotional pain in the form of increased anxiety. Accordingly, Plaintiff is entitled to economic and noneconomic damages against Defendants in an amount to be determined at trial for violation of 42 U.S.C. § 1983.

54. Defendants' actions were also recklessly indifferent to Ms. Carlisle's Eighth Amendment rights and callously disregarded Ms. Carlisle's human needs, health and safety, and punitive damages should be awarded against Defendants in an amount to be determined at trial for violation of 42 U.S.C. § 1983.

55. Ms. Carlisle is entitled to attorney fees and costs pursuant to 42 U.S.C. § 1988.

THIRD CLAIM FOR RELIEF

Monell Claims-8th Amendment Denial of Care and Inhumane Conditions-42 U.S.C. § 1983 (as to Defendants Douglas County and CCS)

56. Plaintiff realleges paragraphs 1-55.

57. The deprivation of Ms. Carlisle's Eighth Amendment rights were a direct result of the following policies, customs or practices of Douglas County and CCS:

a. A policy, custom or practice of denying medically necessary medication to detainees and prisoners as a form of punishment.

b. A policy, custom or practice of not considering prisoners medical needs when making decisions about the providing prescribed drugs or other medically necessary care.

58. The deprivation of Ms. Carlisle's Eighth Amendment rights were a direct result of the following policies, customs or practices of Douglas County:

a. A policy, custom or practice of placing detainees and prisoners in overcrowded cells.

b. A policy, custom or practice of not providing access to basic hygiene products, such as tampons or other menstruation products.

c. A policy, custom or practice of not keeping cells clean.

d. A policy, custom or practice of requiring detainees and prisoners to eat in the same cell where they urinate and defecate.

e. A policy, custom or practice of providing inedible food to prisoners and detainees.

f. A policy, custom or practice of not allowing prisoners and detainees to regularly exercise when placed in disciplinary housing cells.

59. The policies, customs or practices of Defendants posed a substantial risk of depriving Ms. Carlisle of her Eighth Amendment rights, and Defendants were aware, or should have been aware, of this risk.

60. As a direct result of Defendants' policies, Defendants deprived Ms. Carlisle of her right to be free from cruel and unusual punishment under the Eighth Amendment of

the United States Constitution. As a result of Defendants' violation of Ms. Carlisle's constitutional rights, for many months Ms. Carlisle experienced physical pain and suffering and emotional pain in the form of increased anxiety. Accordingly, Plaintiff is entitled to economic and noneconomic damages against Defendants in an amount to be determined at trial for violation of 42 U.S.C. § 1983.

61. Defendant CCS' policies were also recklessly indifferent to Ms. Carlisle's Eighth Amendment rights and callously disregarded Ms. Carlisle's pain and safety, and punitive damages should be awarded against them in an amount to be determined at trial for violation of 42 U.S.C. § 1983.

62. Ms. Carlisle is entitled to attorney fees and costs pursuant to 42 U.S.C. § 1988.

FOURTH CLAIM FOR RELIEF

Supervisory Liability – 8th Amendment – 42 U.S.C. § 1983

(as to Defendants Hanlin and Root)

63. Plaintiff realleges and incorporates herein as though set forth in full paragraphs 1-62.

64. Defendants, in their supervisory capacities, were aware of the policies, customs or practices as alleged in paragraphs 1-62 and were aware that said policies, customs or practices created a substantial risk of causing substantial harm to Douglas County inmates by endangering their physical health, safety and serious medical needs. Despite their knowledge, said supervisors allowed, approved of and ratified said policies, customs or practices.

65. Defendants, in their supervisory capacities, failed to adequately train CCS and Douglas County employees:

a. On the need to provide medically necessary care despite disciplinary needs;

b. On the need to provide basic hygiene products, such as tampons and toilet paper, in the housing areas of the jail;

c. On the need to allow hygienic services, such as showers, to jail inmates;

d. On the need to allow inmates to eat in uncontaminated spaces fit for such activities;

e. On the need to provide food fit for human consumption.

66. Defendants were aware that these failures to train created a substantial risk of causing harm to and cruel and unusual treatment of Douglas County Jail inmates.

67. As a direct result of the actions and inactions of Defendants, Ms. Carlisle endured and suffered severe physical and emotional distress. As such, Ms. Carlisle is entitled to compensatory damages in an amount to be determined at trial.

68. The actions of Defendants, were recklessly indifferent to Ms. Carlisle's and other inmates, and callously disregarded her health and physical and emotional safety. As such Ms. Carlisle should be awarded punitive damages in an amount to be determined at trial.

69. Ms. Carlisle is entitled to attorney fees and costs pursuant to 42 U.S.C. § 1988.

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FIFTH CLAIM FOR RELIEF

Respondeat Superior Liability – 8th Amendment – 42 U.S.C. § 1983

(as to Defendant CCS)

70. Plaintiff realleges paragraphs 1-69 and incorporates them herein.

71. Defendants Blum, Nurse Doe and Medical Assistant Doe were acting in the scope of their employment with and as agents of Defendant CCS.

72. Defendants Blum's, Nurse Doe's and Medical Assistant Doe's actions resulted in violations of Ms. Carlisle's Eight Amendment rights to be free from cruel and unusual punishment.

73. Defendant CCS ratified the actions of its employees and agents.

74. As such, Ms. Carlisle should be awarded compensatory damages in an amount to be determined at trial.

75. The actions of Defendants, were recklessly indifferent to Ms. Carlisle's and other inmates, and callously disregarded her health and physical and emotional safety. As such Ms. Carlisle should be awarded punitive damages in an amount to be determined at trial.

76. Ms. Carlisle is entitled to attorney fees and costs pursuant to 42 U.S.C. § 1988.

SIXTH CLAIM FOR RELIEF

Common Law Negligence

(as to Defendants Dr. Blum, Nurse Doe, Medical Assistant Doe, and Officers Doe(s))

77. Plaintiff realleges paragraphs 1-69.

78. Because of Ms. Carlisle's status as an inmate, Defendants owed a duty of care to ensure she received appropriate and adequate medical care while she was incarcerated.

79. Defendants breached their duty of care when they refused to administer Ms. Carlisle's neuropathy medication from May 31, 2015 to August 4, 2015.

80. Defendants knew or should have known that refusing to administer Ms. Carlisle's medication would cause her to experience pain and suffering.

81. Ms. Carlisle suffered from severe neuropathy related pain in her feet, difficulty walking and sleeping, Restless Leg Syndrome, and anxiety for three months during her incarceration.

82. Ms. Carlisle's pain and suffering were caused by Defendants' actions while she was in Defendants' care.

83. Accordingly, Ms. Carlisle is entitled to economic and noneconomic damages against Defendants in an amount to be determined at trial for Defendants' breach of their duty of care.

SEVENTH CLAIM FOR RELIEF

Common Law *Respondet Superior* Liability

(as to Defendants CCS and Douglas County)

84. Plaintiff realleges paragraphs 1-83.

85. Defendants described in paragraphs 76-81 committed negligent acts while acting in the scope of their employment with and as agents of Defendant CCS.

86. Ms. Carlisle's pain and suffering were caused by Defendants' actions while she was in Defendants' care.

87. Accordingly, Ms. Carlisle is entitled to economic and noneconomic damages against Defendants in an amount to be determined at trial for Defendants' breach of their duty of care.

WHEREFORE, Plaintiff prays for relief as follows:

- a. For judgment in favor of Plaintiff against all Defendants for her economic and noneconomic damages;
- b. For punitive damages against all Defendants except Defendant Douglas County;
- c. For injunctive relief against Defendants requiring implementation of policy forbidding the withholding of medication for purposes of punishment and mandating training employees on the same;
- d. For reasonable attorneys' fees and costs; and
- e. For such other relief as is just and appropriate.

PLAINTIFF DEMANDS A JURY TRIAL

DATED: May 30, 2017.

ACLU FOUNDATION OF OREGON, INC.

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