

Index of Exhibits to Declaration of David Fathi

Exhibit	Description
A	Email from Michael Puisis, D.O. to all counsel (April 13, 2020)
B	Spreadsheet attached to email from Michael Puisis, D.O., listing medically vulnerable persons detained at the Baltimore City Detention Center (BCDC) (April 13, 2020)
C	Email from Defendants' counsel Laura Mullally to Plaintiffs' counsel stating that no detainees had been tested to date (May 5, 2020)
D	Email from Michael Puisis, D.O. to all counsel (May 7, 2020)
E	Email chain between Michael Puisis, D.O. and all counsel (May 8, 2020)
F	Email from Laura Mullally responding to David Fathi (May 8, 2020)
G	Email from Laura Mullally stating that two detainees had tested positive for COVID-19 (May 12, 2020)
H	Email from Laura Mullally stating that eight detainees had tested positive for COVID-19 (May 15, 2020)
I	Email chain between Laura Mullally and Debra Gardner regarding a detainee with serious medical conditions, including COVID-19 infection (May 15, 2020)
J	Email from Laura Mullally stating that seven staff members, eight vendor employees, and seven detainees had tested positive for COVID-19 (May 18, 2020)
K	Baltimore Central Booking and Intake Center (BCBIC) Housing spreadsheet, provided by Laura Mullally to Plaintiffs' counsel (May 18, 2020)
L	Email from Laura Mullally stating the current population of BCBIC (May 1, 2020)

EXHIBIT A

From: Michael Puisis [REDACTED]
Sent: Monday, April 13, 2020 11:56 AM
To: Debra Gardner <gardnerd@publicjustice.org>; David Fathi <dfathi@aclu.org>; Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>; Laura Mullally -DPSCS- <laura.mullally@maryland.gov>; Michael Resnick <michael.resnick@maryland.gov>; Leon A. King -DPSCS- <leon.king@maryland.gov>; Zakaria Shaikh -DPSCS- <zakaria.shaikh@maryland.gov>; Sharon Baucom -DPSCS- <sharon.baucom@maryland.gov>
Cc: Tessema, Isaias <Isaias.Tessema@corizonhealth.com>; Wubu, Fasil <Fasil.Wubu@corizonhealth.com>
Subject: COVID risk list

Many thanks to Drs. Tessema and Wubu for working over the weekend to review records.

This Excel spreadsheet lists all persons in the jail on the chronic illness list. Dr. Tessema and Wubu went through every record and identified the precise medical conditions of the patient with respect to CDC risk. We utilized the CDC risk factors as shown at the following link. <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/groups-at-higher-risk.html> The doctors went through records and identified every patient with one of these risk factors and placed a x in the column pertaining to that risk. I had a colleague at University of Illinois sort the list. There were only two persons over 65 on the chronic illness list. The Commissioner should give Defendants a list of persons over 65 without chronic illness because they have a risk as well specifically age and might not have been on this list. The spreadsheet is ranked in so far as listing people in order of what we would perceive as a risk rank. These include:

1. > 65 years of age
2. > 50 years of age with 2 CDC medical risk factors
3. >50 with 1 CDC medical risk factor
4. <50 with 2 CDC medical risk factors
5. <50 with 1 CDC medical risk factor
6. >50 with 0 CDC medical risk factors
7. <50 with 0 CDC medical risk factors

The persons with no CDC risk and < 50 have the lowest risk. So the table can be used from the top down to identify those with highest risk. There are about 100 people who should be targeted for release if possible.

Thanks to the doctors for helping on the week end. I already thanked Dr. Kim for her assistance in the sort.

Mike Puisis

EXHIBIT B

Region	Site	LastName	FirstName	SID#	DOB	Diabetes	AsthmaCOPD	MICHFaf	Immune	BMigt40	CKD	LiverDisease	diabetes2	asthmacopd2	michfaf2	immune2	bmigt402	ckd2	liverd2	date	age	comorb	class	
GREATER THAN 65 NO ONE HAS A LISTED CDC HEALTH RISK																								
BALT	BCBIC												0	0	0	0	0	0	0	12-Apr-2020	73	0	6	
BALT	BCBIC												0	0	0	0	0	0	0	12-Apr-2020	67	0	6	
GREATER THAN 50 WITH TWO OR MORE HEALTH RISK FACTORS																								
BALT	BCBIC					X		X					1	0	1	0	0	0	0	12-Apr-2020	63	2	5	
BALT	BCBIC					X	X						1	1	0	0	0	0	0	12-Apr-2020	58	2	5	
BALT	BCBIC						X	X					0	1	1	0	0	0	0	12-Apr-2020	57	2	5	
BALT	BCBIC					X		X					1	0	1	0	0	0	0	12-Apr-2020	55	2	5	
BALT	BCBIC					X	X						1	1	0	0	0	0	0	12-Apr-2020	51	2	5	
GREATER THAN 50 WITH ONE HEALTH RISK FACTOR																								
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	64	1	4	
BALT	BCBIC									X			0	0	0	0	0	0	1	0	12-Apr-2020	62	1	4
BALT	BCBIC						X						0	1	0	0	0	0	0	12-Apr-2020	60	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	60	1	4	
BALT	BCBIC								X				0	0	0	1	0	0	0	12-Apr-2020	59	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	59	1	4	
BALT	BCBIC						X						0	1	0	0	0	0	0	12-Apr-2020	58	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	57	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	56	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	55	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	55	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	54	1	4	
BALT	BCBIC						X						0	1	0	0	0	0	0	12-Apr-2020	54	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	53	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	52	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	52	1	4	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	51	1	4	
BALT	BCBIC									X			0	0	0	0	0	0	1	12-Apr-2020	51	1	4	
BALT	BCBIC							X					0	0	0	1	0	0	0	12-Apr-2020	51	1	4	
BALT	BCBIC					X							0	1	0	0	0	0	0	12-Apr-2020	50	1	4	
LESS THAN 50 WITH 2 CDC HEALTH RISK FACTORS																								
BALT	BCBIC					X	X						1	1	0	0	0	0	0	12-Apr-2020	45	2	3	
BALT	BCBIC					X	X						1	1	0	0	0	0	0	12-Apr-2020	43	2	3	
BALT	BCBIC					X			X				0	1	0	1	0	0	0	12-Apr-2020	36	2	3	
BALT	BCBIC					X	X						1	1	0	0	0	0	0	12-Apr-2020	35	2	3	
BALT	BCBIC							X		X			0	0	1	0	1	0	0	12-Apr-2020	34	2	3	
BALT	BCBIC					X			X				1	0	0	1	0	0	0	12-Apr-2020	33	2	3	
BALT	BCBIC					X	X						1	1	0	0	0	0	0	12-Apr-2020	27	2	3	
BALT	BCBIC						X		X				0	1	0	1	0	0	0	12-Apr-2020	25	2	3	
LESS THAN 50 AND 1 HEALTH RISK FACTOR																								
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	49	1	2	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	48	1	2	
BALT	BCBIC								X				0	0	0	1	0	0	0	12-Apr-2020	46	1	2	
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BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	45	1	2	
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BALT	BCBIC						X						0	1	0	0	0	0	0	12-Apr-2020	40	1	2	
BALT	BCBIC					X							1	0	0	0	0	0	0	12-Apr-2020	40	1	2	
BALT	BCBIC								X				0	0	0	0	1	0	0	12-Apr-2020	39	1	2	
BALT	BCBIC						X						0	1	0	0	0	0	0	12-Apr-2020	39	1	2	

BALT	BCBIC		X						0	1	0	0	0	0	0	0	12-Apr-2020	39	1	2
BA;T	BCBIC		X						1	0	0	0	0	0	0	0	12-Apr-2020	36	1	2
BALT	BCBIC		X						1	0	0	0	0	0	0	0	12-Apr-2020	36	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	34	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	33	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	32	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	30	1	2
BALT	BCBIC					X			0	0	0	1	0	0	0	0	12-Apr-2020	29	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	29	1	2
BALT	BCBIC						X		0	0	0	0	1	0	0	0	12-Apr-2020	28	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	27	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	25	1	2
BALT	BCBIC		X						1	0	0	0	0	0	0	0	12-Apr-2020	23	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	22	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	22	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	21	1	2
BALT	BCBIC			X					0	1	0	0	0	0	0	0	12-Apr-2020	20	1	2
BALT	BCBIC					X			0	0	0	1	0	0	0	0	12-Apr-2020	20	1	2
BALT	BCBIC		X						1	0	0	0	0	0	0	0	12-Apr-2020	1	1	2
OLDER THAN 50 AND NO CDC HEALTH RISK FACTORS BUT ON CHRONIC CARE LIST																				
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	64	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	64	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	63	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	63	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	62	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	62	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	61	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	61	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	60	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	59	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	58	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	57	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	57	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	56	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	56	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	56	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	55	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	55	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	54	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	54	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	53	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	53	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	52	0	1
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BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	52	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	51	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	51	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	51	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	51	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	51	0	1
BALT	BCBIC								0	0	0	0	0	0	0	0	12-Apr-2020	50	0	1

EXHIBIT C

From: Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Sent: Tuesday, May 5, 2020 11:13 AM
To: David Fathi <dfathi@aclu.org>
Cc: Debra Gardner (<gardnerd@publicjustice.org> <gardnerd@publicjustice.org>); Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>
Subject: Re: BCBIC updated statistics

There have been no detainees tested to date.

Laura Mullally Assistant Attorney General
300 East Joppa Road, Suite 1000
Towson, MD 21286
410-339-7562
laura.mullally@maryland.gov

On Tue, May 5, 2020 at 10:03 AM David Fathi <dfathi@aclu.org> wrote:
Thank you, Laura. How many Duvall class members have been tested?

David C. Fathi*
Director, ACLU National Prison Project
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Washington, DC 20005
(202) 548-6603
dfathi@aclu.org
@DavidCFathi

*Not admitted in DC; practice limited to federal courts

From: Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Sent: Tuesday, May 5, 2020 9:53 AM
To: David Fathi <dfathi@aclu.org>
Cc: Debra Gardner (<gardnerd@publicjustice.org> <gardnerd@publicjustice.org>); Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>
Subject: Re: BCBIC updated statistics

David, Elizabeth and Debra:

Update as of this morning. 6 BCBIC staff and 4 contractual staff have tested positive for COVID-19. No positives amongst the Duvall plaintiff class.

Laura Mullally Assistant Attorney General
300 East Joppa Road, Suite 1000
Towson, MD 21286
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laura.mullally@maryland.gov

EXHIBIT D

From: Michael Puisis [REDACTED]
Sent: Thursday, May 7, 2020 9:32 AM
To: Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>; David Fathi <dfathi@aclu.org>; Debra Gardner <gardnerd@publicjustice.org>; Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Cc: Tessema, Isaias <Isaias.Tessema@corizonhealth.com>; Sharon Baucom -DPSCS- <sharon.baucom@maryland.gov>; Michael Resnick <michael.resnick@maryland.gov>; Leon A. King -DPSCS- <leon.king@maryland.gov>; Zakaria Shaikh -DPSCS- <zakaria.shaikh@maryland.gov>
Subject: Update on COVID

I spoke to Dr. Tessema. Here is the COVID update.

There are three people with symptoms but without fever who have been isolated and have been tested. Test results are pending.

There are two people who were near the persons with symptoms and they have been quarantined.

All incoming inmates are quarantined in separate housing for 14 days.

Tests are now available to the jail.

High risk individuals will be tested starting with the highest risk individuals based on the list developed recently. The intent is to test all of these individuals.

Persons with mental health issues who are being transferred to a higher level of mental health care are being tested prior to transfer.

Test material is now available (a couple hundred test kits).

I have recommended to Dr. Tessema that incoming inmates be tested and consideration should be given to also testing mental health patients who lack executive function to describe symptoms. A low bar for symptoms should be used with respect to testing of any inmate. The same would hold for employees with the exception that they would see their private provider for testing.

All staff (health and custody) are required to mask. All inmates in isolation and quarantine are masked. Dr. Tessema was going to verify that all newly incarcerated inmates in quarantine are masked but he thought they were.

Dr. Tessema will be sending me regular updates on persons in isolation, tested, and quarantined.

Mike Puisis

EXHIBIT E

From: David Fathi <dfathi@aclu.org>
Sent: Friday, May 8, 2020 8:19 AM
To: Michael Puisis [REDACTED]; Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>; Debra Gardner <gardnerd@publicjustice.org>; Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Cc: Tessema, Isaias <Isaias.Tessema@corizonhealth.com>; Sharon Baucom -DPSCS- <sharon.baucom@maryland.gov>; Michael Resnick <michael.resnick@maryland.gov>; Leon A. King -DPSCS- <leon.king@maryland.gov>; Zakaria Shaikh -DPSCS- <zakaria.shaikh@maryland.gov>
Subject: Re: Update on COVID

Thank you, Dr. Puisis and Dr. Tessema.

Laura, could you please let us know if BCBIC intends to implement Dr. Puisis' recommendations on testing (highlighted below)? If so, what is the anticipated timeline for doing so?

Thanks very much,

David

David C. Fathi*
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(202) 548-6603
dfathi@aclu.org
@DavidCFathi

*Not admitted in DC; practice limited to federal courts

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To: Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>; David Fathi <dfathi@aclu.org>; Debra Gardner <gardnerd@publicjustice.org>; Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Cc: Tessema, Isaias <Isaias.Tessema@corizonhealth.com>; Sharon Baucom -DPSCS- <sharon.baucom@maryland.gov>; Michael Resnick <michael.resnick@maryland.gov>; Leon A. King -DPSCS- <leon.king@maryland.gov>; Zakaria Shaikh -DPSCS- <zakaria.shaikh@maryland.gov>
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Dr. Tessema will be sending me regular updates on persons in isolation, tested, and quarantined.

Mike Puisis

EXHIBIT F

From: Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Sent: Friday, May 8, 2020 4:04 PM
To: David Fathi <dfathi@aclu.org>; Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>; Contact <gardnerd@publicjustice.org>
Subject: following Dr. Puisis's advice

David:

Dr. Isaias Tessema, the chief physician for BCBIC, has given the following testing priorities until more testing becomes available:

1. Any symptomatic patient - using the CDC guidelines;
2. Policy driven Department of Health transfer screening, court order;
3. High risk asymptomatic screening using the prioritization below.

Asymptomatic prioritization:

1. less than 65y with co-morbid condition(s) - highest risk per CDC guidelines;
2. less than 55y with any chronic disease currently cohorted and/ or monitored on in identified areas in the facility;
3. less than 60 y;
4. less than 50y with 2 CDC medical risk factors;
5. less than 50y with 1 CDC medical risk factor;
6. less than 50 years with 2 CDC medical risk factors;
7. less than 50 years with 1 CDC medical risk factor.

Laura Mullally Assistant Attorney General
300 East Joppa Road, Suite 1000
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EXHIBIT G

From: Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Sent: Tuesday, May 12, 2020 11:48 AM
To: David Fathi <dfathi@aclu.org>; Elizabeth Alexander
<ealexander@lawofficesofelizabethalexander.com>; Contact <gardnerd@publicjustice.org>
Subject: update

There are 2 detainees in the Duvall plaintiff class with COVID-19.

Laura Mullally Assistant Attorney General
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EXHIBIT H

From: Laura Mullally -DPSCS- <laura.mullally@maryland.gov>

Sent: Friday, May 15, 2020 8:27 AM

To: David Fathi <dfathi@aclu.org>; Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>; Contact <gardnerd@publicjustice.org>

Subject: testing at BCBIC

David:

In response to your question, as of 5/13/20, 36 detainees at BCBIC have been tested. Of the 36, 25 are negative, 5 are pending results, 3 are positive for COVID-19, and 3 have refused the testing.

As of today, 8 detainees at BCBIC are confirmed positive for COVID-19.

Laura Mullally Assistant Attorney General
300 East Joppa Road, Suite 1000
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EXHIBIT I

Re: Detainee with serious medical needs not getting proper attention

laura.mullally@maryland.gov

To: gardnerd@publicjustice.org (+3)

Friday, May 15, 2020 - 11:53am

SECURE REPLYcommon.buttons.toggleDropdown

[Virtru Encrypted Message](#)

Debra:

I spoke with Getnet Luka M.D., who is a supervising physician at the MTC Hospital, about Mr. [REDACTED]'s medical condition. I also looked at the Maryland Judiciary Case Search for [REDACTED] (DOB [REDACTED]). Here is what I learned:

[REDACTED] is currently serving a 5 year term of confinement for a felon in possession of a firearm charge, and two violations of probation for a separate felon in possession charge and a possession with intent to distribute charge. Those case numbers are: [REDACTED], and [REDACTED].

His attorneys have filed two 8-507 petitions, which are to release him from incarceration to a drug treatment program. Hearings are pending on 6/18/20 for the two VOPs and 7/17/20 for the non-probationary felon in possession case. These hearings should be consolidated.

Here's the update on [REDACTED]'s medical condition per Dr. Luka. This is shared with you pursuant to paragraph 36(c) of the Settlement Agreement.

[REDACTED] came into the plaintiff class in December of 2018 by virtue of being transferred to the MTC Hospital. He was shot in the back in 2017, and is a paraplegic. When he came into custody in December, 2018, he had a stage 4 pressure ulcer on his buttock, and was both bowel and bladder incontinent. He was confined to a wheelchair. At MTC, he was given a course of antibiotics, and transferred to Bon Secours Hospital (now Grace Medical Center) in August, 2019.

At Grace Medical, a surgeon suggested that the pressure ulcer be debrided, and the plan of care was to create a surgical flap to close the ulcer once it was clean. The wound was debrided successfully, and a procedure was scheduled for February, 2020 to close the ulcer via the flap. That procedure is now on hold, because it is considered an elective surgery, and elective surgeries are not being performed as a result of the COVID-19 predicament.

In preparation for the surgery, his body was x-rayed, and it was determined that his hip was indeed dislocated.

Last weekend, he was experiencing nausea and vomiting, and was taken to Grace Medical, where he was tested for COVID-19. He tested negative over the weekend, and tested positive yesterday. He is hospitalized in Grace Medical. His condition was stable last night.

[REDACTED] is eligible for consideration for compassionate release. I should have more information for you on the Department's end in the next 24 hours. Since he is serving a sentence, release would have to be effectuated by the judge(s) who sentenced him. However, any medical recommendation would start with his care providers in the Department.

I forgot to ask Dr. Luka about washing and turning. I will follow up, though. Inmates and detainees throughout the state are permitted free telephone calls. I don't know if the same is true for hospitalized inmates, though.

Laura Mullally Assistant Attorney General
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On Thu, May 14, 2020 at 2:47 PM Debra Gardner
(gardnerd@publicjustice.org) <gardnerd@publicjustice.org> wrote:
Laura:

Please ask your clients to look into the following and take appropriate action immediately:

██████████, inmate number ██████████. According to his mother, Mr. ██████████ was shot several months before being put in jail, and he's paralyzed. He's apparently only being moved or washed once per week, and is now in the hospital with a dislocated hip and she hasn't heard from him in weeks. His hip was dislocated while in a doctor's appointment. He also hasn't had access to medication he needs for blood clots. He was originally in BCBIC but was moved straight to the infirmary. He's never been in the general population, and has been in the infirmary for about two years. On three separate occasions, the warden has told his mother that he is about to be released, so that he can get reconstructive surgeries that he needs. Each time, the release has fallen through, and his mother thinks it has been stopped by the doctors in the infirmary for some reason. He also has severe pressure sores that haven't been treated. His mother has records of all of her efforts to address these concerns for the last two years.

If there is any way that Mr. ██████████ is eligible for release as the warden may have concluded, obviously that result would be ideal.

I look forward to hearing from you soon.

Deb.

Debra Gardner
Legal Director
Public Justice Center

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Pronouns: she, her, hers

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EXHIBIT J

From: Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Sent: Monday, May 18, 2020 11:47 AM
To: Debra Gardner (gardnerd@publicjustice.org) <gardnerd@publicjustice.org>
Cc: David Fathi <dfathi@aclu.org>; Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>
Subject: Re: Update housing

Debra:

That may take some time.

As of this morning, 7 staff members, 8 vendor employees, and 7 detainees have COVID-19.

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EXHIBIT K

EXHIBIT L

From: Laura Mullally -DPSCS- <laura.mullally@maryland.gov>
Sent: Friday, May 1, 2020 11:51 AM
To: Elizabeth Alexander <ealexander@lawofficesofelizabethalexander.com>; David Fathi <dfathi@aclu.org>; Contact <gardnerd@publicjustice.org>
Subject: BCBIC updated statistics

Counsel:

In response to your request of April 17, 2020, please see below:

1. Population count for BCBIC 5/1/20:
General population males: 326; general population females 99;
113 males in intake; 17 females in intake.
2. No COVID-19 positives amongst the plaintiff class, or the State employees and contractors at BCBIC;
3. No tests available yet.

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