

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
PINE BLUFF DIVISION**

**BRUNSON ROBERTS,
ADC #127841**

PLAINTIFF

v.

No. 5:10-cv-174-DPM

RODERICK JOHNSON and RICKY WEBB

DEFENDANTS

ORDER

The Court attaches recently received letters and materials from counsel to this Order. To make a complete record, the Court prefers that counsel communicate about such matters with the Court only by filing matters in the docket.



D.P. Marshall Jr.
United States District Judge

5 March 2013



Roberts v. Hobbs, et al 5:10CV00174

Christine Cryer

to:

grather@wlj.com, Courtney C. McLarty

03/04/2013 05:42 PM

Cc:

"dpmchambers@ared.uscourts.gov"

Hide Details

From: Christine Cryer <christine.cryer@arkansasag.gov>

To: "grather@wlj.com" <grather@wlj.com>, "Courtney C. McLarty" <CMcLarty@wlj.com>,

Cc: "dpmchambers@ared.uscourts.gov" <dpmchambers@ared.uscourts.gov>

History: This message has been forwarded.

1 Attachment



20130304174142.pdf

Letter attached.

Christine A. Cryer

Assistant Attorney General

323 Center, Suite 200

Little Rock, Arkansas 72201

(501) 683-0958

christine.cryer@arkansasag.gov



STATE OF ARKANSAS
OFFICE OF THE ATTORNEY GENERAL
DUSTIN McDANIEL

Christine A. Cryer
Assistant Attorney General

Direct dial: (501) 683-0958
Facsimile: (501) 682-2591
E-mail: christine.cryer@arkansasag.gov

March 4, 2013

Courtney C. McLarty
Gordon S. Rather, Jr.
Wright, Lindsey & Jennings
200 West Capitol Ave., Suite 2300
Little Rock, AR 72201-3699

Via email and Regular U.S. Mail

Re: Roberts v. Hobbs, et al., USDC 5:10cv174

Dear Courtney and Gordon:

In preparation for next week's trial, I visited the Varner Unit today to obtain cleaner copies of the sanitation documents already in the record. As I was going through the sanitation and security records, I found a number of VSM Sanitation Rosters dated September 2009 which had not previously been produced to me. Attached is a copy of the sanitation rosters I found. I think you will agree they are relevant to the lawsuit, and as such, I intend to offer them as exhibits at trial.

Although they are relevant, I anticipate you will object to the introduction of these records due to their late discovery. If the Court does not allow me to introduce them as exhibits, I will ask that I be allowed to use them for impeachment purposes.

By copy of this letter to the Court, I am notifying his Honor of the document discovery, so that the issue can be addressed prior to trial.

Sincerely,

A handwritten signature in black ink that reads "Christine A. Cryer".

CHRISTINE A. CRYER
Assistant Attorney General

CAC

cc: Honorable D.P. Marshall via email w/ attachments

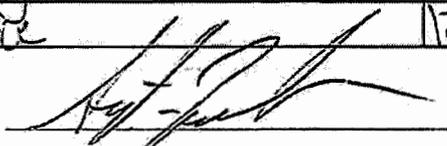
VARNER SUPERMAX SANITATION ROSTER

DATE 9-8-09

OFFICER: COTT K. AVERY

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-601	R. Jones	137288	B	✓				
CB6-602	B. Roberts	127841	B	✓				
CB6-603	R. Hamel	119952	W	✓				
CB6-604	A. Millbrooks	137215	B	✓				
CB6-605	M. Davis	137423	B	✓				
CB6-606	R. Brinker	129521	B	✓				
CB6-607	M. Chang	134065	B	✓				
CB6-608	W. Murray	097878	B	✓				
CB6-609	T. Jefferson	082821	B	✓				
CB6-610	I. Hawkins	142804	B	✓				
CB6-611	R. Scott	108910	B	✓				
CB6-612	L. Goston	106879	B	✓				
CB6-613	J. Shalls	137268	B	✓				
CB6-614	B. Moore	118968	B	✓				
CB6-615	M. Brandon	081646	B	✓				
CB6-616	P. Holloway	121217	B	✓				
CB6-617	C. Gullett	115254	B	✓				
CB6-618	W. Johnson	120860	B	✓				
CB6-619	R. Green	117655	B	✓				
CB6-620	L. Van	108062	B	✓				
CB6-621	E. Gairns	127239	B	✓				
CB6-622	T. O'Guinn	128462	B	✓				
CB6-623	F. Lamb	119644	W	✓				
CB6-624	J. Duckett	113491	B	✓				
CB6-625	K. Young	107897	B	✓				
CB6-626	K. Pearce	137692	B	✓				

Supervisor's Signature



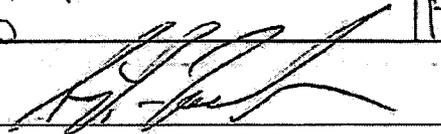
VARNER SUPERMAX SANITATION ROSTER

DATE 9-8-09

OFFICER: Cott K. Avercy

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-627	C. Talley	121370	B	✓				
CB6-628	D. Venson	108871	B	✓				
CB6-629	D. Taylor	109416	W	✓				
CB6-630	D. Scott	131042	B	✓				
CB6-631	L. Taylor	136924	B	✓				
CB6-632	E. Thruwer	093962	B	✓				
CB6-633	A. Pigge	138070	B	✓				
CB6-634	C. Davis	134210	B	✓				
CB6-635	T. Werten	161074	B	✓				
CB6-636	F. White	133345	B	✓				
CB6-637	O. Wardlaw	140703	B	✓				
CB6-638	D. Beal	114528	B	✓				
CB6-639	P. Bold	082417	B	✓				
CB6-640	D. Shepard	127805	B	✓				
CB6-641	M. Simmens	140520	B	✓				
CB6-642	C. Norman	135064	B	✓				
CB6-643	N. Thomson	120474	B	✓				
CB6-644	J. G. Hix	112981	B	✓				
CB6-645	J. Powell	118847	B	✓				
CB6-646	S. Barber	087336	B	✓				
CB6-647	K. McCoy	106887	B	✓				
CB6-648	J. Tankaway	102964	B	✓				
CB6-649	D. Terry	112868	B	✓				
CB6-650	J. Hewitt	119998	B	✓				
CB6-651	L. VanAllen	101220	W	✓				
CB6-652	J. Drew	134888	B	✓				

Supervisor's Signature



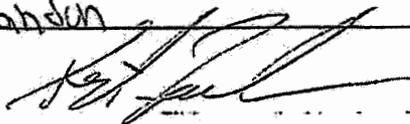
VARNER SUPERMAX JANITATION ROSTER

DATE 9-8-09

OFFICER: COT. K. AVERY

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-653	S. Beavers	136948	B	✓				
CB6-654	M. Meadows	134096	B	✓				
CB6-655	G. Fowler	12822	B	✓				
CB6-656	L. Nixon	094381	B	✓				
CB6-657	A. Ellis	136795	B	✓				
CB6-658	B. Farris	131950	W	✓				
CB6-659	E. Cook	120909	B	✓				
CB6-660	D. Oxford	144649	W	✓				
CB6-661	D. Woods	108514	B	✓				
CB6-662	R. Weaver	138075	B	✓				
CB6-663	D. Wynn	118789	B	✓				
CB6-664	M. Hall	078294	B	✓				
CB6-665	G. Pillsbury	135299	W	✓				
CB6-666	C. Whitley	138096	W	✓				
CB6-667	M. Butler	501230	W	✓				
CB6-668	S. Flowers	135069	B	✓				
CB6-669	C. Norwood	140057	B	✓				
CB6-670	K. Bradley	131571	B	✓				
CB6-671	L. Booth	140482	B	✓				
CB6-672	K. LeFlore	133845	B	✓				
CB6-673	D. Jackson	119222	B	✓				
CB6-674	T. Smith	135653	B	✓				
CB6-675	D. Coleman	128134	B	✓				
CB6-676	D. Boyd	107421	B	✓				
CB6-677	R. Hewing	136749	B	✓				
CB6-678	M. Robinson	139742	B	✓				

Supervisor's Signature



☑ = YES

☒ = NO

DEPARTMENT OF CORRECTIONS
SECURITY CHECK LOG

DATE: 9-11-09

400-5

		CB6 CELL CLEAN-UP Chart	
01	✓	Rodney JONES #137288	- Black
02	✓	B. Roberts #127841	- Black
03	✓	R. Hamel #119952	- caucasian
04	✓	A. Millbrooks #137215	- Black
05	✓	M. Davis #137423	- Black
06	✓	R. Brisker #129531	- Black
07	✓	K. Chestang #134005	- Black
08	✓	W. Murry #097878	- Black
09	NO-X	T.C. JEFFERSON #82821	- Black
10	✓	T. HAWKINS #142524	- Black
11	NO-X	K. Scott #108913	- Black
12	NO-X	L. GOSTON #105879	- Black
13	NO-X	J. Qualls #137268	- Black
14	NO-X	B. Moore #118958	- Black
15	✓	M. Brandon #081646	- Black
16	NO-X	P. Holloway #121217	- Black
17	NO-X	C. Gullett #115254	- Black
18	NO-X	W. JOHNSON #120860	- Black
19	✓	R. GREEN #117055	- Black
20	✓	L. VAN #108062	- Black
21	✓	E. GAINES #123239	- Black
22	✓	T. O'GUINN #138452	- Black
23	✓	J. STEPHENS #094967	- Black
24	NO-X	J. DUCKETT #113494	- Black
25	✓	R. Young #103847	- Black
26	✓	K. PEARCE #137692	- Black
27	✓	C. Talley #121370	- Black
28	✓	J. VENSON #108871	- Black
29	NO-X	D. Taylor #109416	- caucasian
30	NO-X	D. Scott #131042	- Black
31	✓	L. Taylor #136924	- Black
32	NO-X	E. Thrower #093952	- Black
33	NO-X	A. PIGGEE #138070	- Black
34	✓	C. Davie #134310	- Black
35	✓	P. WALSTON #141612	- Black
36	✓	E. Whitt #133345	- Black
37	✓	O. Wardlow #130703	- Black
38	✓	J. Beal #114528	- Black
39	NO-X	T. Boyd #082417	- Black
40	✓	D. Shepard #127803	- Black
41	✓	M. SIMMONS #140732	- Black
42	✓	C. NORMAN #135864	- Black
43	✓	N. THOMPSON #120474	- Black

Col Coltrane

OFFICER SIGNATURE

400-5

VARNER SUPERMAX SANITATION ROSTER

DATE 9-14-09

State OFFICER: CO. Williams
Supplies

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-601	Jones, R	137288		✓	✓			
CB6-602	Roberts, B	127841		✓	✓			
CB6-603	Hamel, R	119952		✓	✓			
CB6-604	Millbrooks, A	137215		✓	✓			
CB6-605	Davis, M	137423		✓	✓			
CB6-606	Brisker, R	129531		✓	✓			
CB6-607	Chestang, K	134005		✓	✓			
CB6-608	Murry, Muhammad, W	97878		✓	✓			
CB6-609	Jefferson, T	82821		✓	✓			
CB6-610	Hawkins, T	142524		✓	✓			
CB6-611	Scott, R	108913		✓	✓			
CB6-612	Gaston, L	105879		✓	✓			
CB6-613	Qualls, J	137268		R	✓			
CB6-614	Moore, B	118958		✓	✓			
CB6-615	Brandon, M	81676		✓	✓			
CB6-616	Holloway, P	61217		✓	✓			
CB6-617	Gubkey, C	115254		R	✓			
CB6-618	Johnson, W	120860		✓	✓			
CB6-619	Green, R	117655		✓	✓			
CB6-620	Van, Lamant	108062		✓	✓			
CB6-621	Gaines, E	123239		✓	✓			
CB6-622	O'Guinn, T	138452		✓	✓			
CB6-623	Stephens, J	94967		✓	✓			
CB6-624	Duckett, J	113494		R	✓			
CB6-625	Young, R	103847		✓	✓			
CB6-626	Pearce, K	137192		✓	✓			

Supervisor's Signature

Sgt Spencer

VARNER SUPERMAX SANITATION ROSTER

DATE 9-14-09

OFFICER: CO. K. Williams

Cell	Name	ADC#	Race	Cleaning	Shower Supplies	Grooming	Other	Comments
CB6-627	Talley, C	121370		✓	✓			
CB6-628	Venson, J	108871		✓	✓			
CB6-629	Taylor, D	109416		✓	✓			
CB6-630	Scott, D	131042		✓	✓			
CB6-631	Taylor, L	136924		✓	✓			
CB6-632	Thrower, B	93952		✓	✓			
CB6-633	Piggee, A	138070		✓	✓			
CB6-634	Davie, C	134310		✓	✓			
CB6-635	Walston, P	141612		✓	✓			
CB6-636	Whitt, B	133345		✓	✓			
CB6-637	Wardlow, O	140703		✓	✓			
CB6-638	Beal, J	114528		✓	✓			
CB6-639	Boyd, T	82417		B	✓			
CB6-640	Shepard, D	127803		B	✓			
CB6-641	Simmons, M	140732		✓	✓			
CB6-642	Norman, C	135064		✓	✓			
CB6-643	Thompson, N	120474		✓	✓			
CB6-644	Girkey, J	112981		✓	✓			
CB6-645	Powell, J	118847		✓	✓			
CB6-646	Burber, S	87336		✓	✓			
CB6-647	McCoy/Khabir, h	106881		✓	✓			
CB6-648	Yankaway, J	132954		✓	✓			
CB6-649	Terry, D	112868		✓	✓			
CB6-650	Hewitt, J	119928		✓	✓			
CB6-651	VanAllen, L	131320		✓	✓			
CB6-652	Davis, J	134888		✓	✓			

Supervisor's Signature

VARNER SUPERMAX JANITATION ROSTER

DATE 9-14-09
 State OFFICER: CO. K. Williams
~~Supplies~~
~~Shower~~

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-653	Cread, C	131351		✓	✓			
CB6-654	Meadows, M	134096		✓	✓			
CB6-655	Fowler, G	128222		R	✓			
CB6-656	Nixon, L	94381		✓	✓			
CB6-657	Ellis, A	136795		✓	✓			
CB6-658	Farris, B	131950		R	✓			
CB6-659	Cook, E	120989		R	✓			
CB6-660	Oxford, J	144649		R	✓			
CB6-661	Woods, D	108514		✓	✓			
CB6-662	Weavers, R	138075		✓	✓			
CB6-663	Wynn, D	118789		✓	✓			
CB6-664	Hall, M	18299		✓	✓			
CB6-665	Pillsbury, G	135299		R	✓			
CB6-666	Whitley, C	138096		R	✓			
CB6-667	Butler, M	500230		R	✓			
CB6-668	Flowers, S	135069		R	✓			
CB6-669	Norwood, C	140057		✓	✓			
CB6-670	Bradley, K	131571		✓	✓			
CB6-671	Booth, L	140482		R	✓			
CB6-672	Lefflore, K	133845		✓	✓			
CB6-673	Jackson, J	119222		✓	✓			
CB6-674	Smith, T	135653		R	✓			
CB6-675	Coleman, J	128634		R	✓			
CB6-676	Boddy, D	107421		✓	✓			
CB6-677	Hewing, B	136749		R	✓			
CB6-678	Robinson, M	139742		✓	✓			

Supervisor's Signature

VARNER SUPERMAX SANITATION ROSTER

DATE 9/16/09

OFFICER: C. L. Jones

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-601	Jones, R	137288	B	✓				
CB6-602	Roberts, B	127841	B	✓				
CB6-603	Hamel, R	119952	W	✓				
CB6-604	Millbrooks, A	131215	B	✓				
CB6-605	Davis, M	131123	B	✓				
CB6-606	Driskill, R	129531	B	✓				
CB6-607	Chastang, K	134105	B	✓				
CB6-608	Vacant							
CB6-609	Jafferson, T	118287	B	✓				
CB6-610	Hawkins, T	142529	B	✓				
CB6-611	Scott, R	108913	B	✓				
CB6-612	Easton, L	105879	B	✓				
CB6-613	Qualls, J	131768	B	✓				
CB6-614	Moore, J	118958	B	✓				
CB6-615	Brandon, M	108116	B	✓				
CB6-616	Holloway, P	121217	B	✓				
CB6-617	Robinson, M	139742	B	✓				
CB6-618	Johnson, W	120860	B	✓				
CB6-619	Green, R	117105	B	✓				
CB6-620	Van, L	108062	B	✓				
CB6-621	Egines, E	123239	B	✓				
CB6-622	O'Guinn, T	138452	B	✓				
CB6-623	Stevens, J	109916	B	✓				
CB6-624	Duckett, J	113494	B	✓				
CB6-625	Young, R	103847	B	✓				
CB6-626	Platelyk	137192	B	✓				

Supervisor's Signature

Sgt. J. Plun

Sgt. Plun

VARNER SUPERMAX SANITATION ROSTER

DATE 9/16/09

OFFICER: W L Jones

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-627	Talley, C	12570	B	✓				
CB6-628	Vanson, J	108871	B	✓				
CB6-629	Taylor, J	109416	W	✓				
CB6-630	Scott, D	31872	B	✓				
CB6-631	Taylor, L	136921	B	✓				
CB6-632	Thompson, E	1093952	B	✓				
CB6-633	Piggel, A	138070	B	✓				
CB6-634	Davis, C	134310	B	✓				
CB6-635	Walston, P	141612	B	✓				
CB6-636	Whitt, E	133345	B	✓				
CB6-637	Wardlow, D	140703	B	✓				
CB6-638	Boat, J	14528	B	✓				
CB6-639	Boyd, T	182117	B	✓				
CB6-640	Shepard, D	121803	B	✓				
CB6-641	Simmons, M	140732	B	✓				
CB6-642	Norman, E	135069	B	✓				
CB6-643	Thompson, N	120979	B	✓				
CB6-644	Girley, J	112981	B	✓				
CB6-645	Powell, J	118847	B	✓				
CB6-646	Barber, S	1087336	B	✓				
CB6-647	McNitt, L	106881	B	✓				
CB6-648	VanKaway, J	132959	B	✓				
CB6-649	Jerry, J	112868	B	✓				
CB6-650	Hawitt, J	119998	B	✓				
CB6-651	VanAllen, L	131320	W	✓				
CB6-652	Davis, J	134888	B	✓				

Supervisor's Signature

[Handwritten Signature]

VARNER SUPERMAX SANITATION ROSTER

DATE 9/16/09

OFFICER: CO' L. Jones

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-653	Creal, C	31351	B	✓				
CB6-654	Meadows, M	34096	B	✓				
CB6-655	Fowler, G	28222	B	✓				
CB6-656	Nixon, L	094381	B	✓				
CB6-657	Ellis, A	136795	B	✓				
CB6-658	Farris, J	31950	W	✓				
CB6-659	Cook, E	20909	B	✓				
CB6-660	Oxford, J	44649	W	✓				
CB6-661	Woods, D	108514	B	✓				
CB6-662	Warrick, R	138075	B	✓				
CB6-663	Wynd, D	118789	B	✓				
CB6-664	Hall, M	078299	B	✓				
CB6-665	Pillsbury, G	135299	W	✓				
CB6-666	Whitley, C	138096	W	✓				
CB6-667	Butler, M	500230	W	✓				
CB6-668	Flowers, S	135069	B	✓				
CB6-669	Vacant							
CB6-670	Bradley, R	131571	B	✓				
CB6-671	Booth, L	140782	B	✓				
CB6-672	Letore, R	133815	B	✓				
CB6-673	Jackson, J	119222	B	✓				
CB6-674	Smith, T	135653	B	✓				
CB6-675	Colman, J	128637	B	✓				
CB6-676	Boyd, D	107121	B	✓				
CB6-677	Hawling, R	136779	B	✓				
CB6-678	Robinson, A	139742	B	✓				

Billups, T 130419 B

Supervisor's Signature

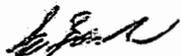
[Handwritten Signature]

VARNER SUPERMAX SANITATION ROSTER

DATE 09-23-09OFFICER: Capt. Johnson

Cell	Name	ADCH	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-601	Johnson, 6	95145		/				
CB6-602	Robert	127841		/				
CB6-603	Hemel	119452		/				
CB6-604	Millbrooks	137215		/				
CB6-605	Davis	137423		/				
CB6-606	Bushner	129531		/				
CB6-607	Ochslung	134005		/				
CB6-608	Jones	139723		/				
CB6-609	Jefferson	082821		/				
CB6-610	Hunkins	142524		/				
CB6-611	Scott	108913		/				
CB6-612	Gordon	105879		/				
CB6-613	Quelle	137268		/				
CB6-614	Moore	118958		/				
CB6-615	Brandon	81646		/				
CB6-616	Holloway	121217		/				
CB6-617	Robison	139742		/				
CB6-618	Johnson	120860		/				
CB6-619	Green	117055		/				
CB6-620	Vea	108062		/				
CB6-621	Ganning	123239		R				
CB6-622	O'Guinn	138452		/				
CB6-623	Stephens	94967		/				
CB6-624	Duchette	113494		/				
CB6-625	Young	103847		/				
CB6-626	Ellis	78658		/				

Supervisor's Signature



VARNER SUPERMAX SANITATION ROSTER

DATE 9-23-09OFFICER: C. P. Johnson

Cell	Name	ADCH	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-627	Tadley	121370		/				
CB6-628	Venson	108771		/				
CB6-629	Taylor	109416		/				
CB6-630	Scott	131042		/				
CB6-631	Taylor	136524		/				
CB6-632	Thrower	093952		R /				
CB6-633	Riggan	138070		/				
CB6-634	Davis	134710		/				
CB6-635	_____	_____		_____				
CB6-636	Whitt	133345		/				
CB6-637	Wardlow	140703		/				
CB6-638	Beal	114528		/				
CB6-639	Boyd	82417		/				
CB6-640	Shepard	127807		/				
CB6-641	Simmons	140732		/				
CB6-642	Norman	135064		/				
CB6-643	Thompson	120474		/				
CB6-644	Carley	112981		/				
CB6-645	Lowell	118847		/				
CB6-646	Barber	87336		/				
CB6-647	McLoy	106881		/				
CB6-648	Vanderman	132454		/				
CB6-649	Terry	112867		/				
CB6-650	Hevitt	119998		/				
CB6-651	Vandy Allen	131720		/				
CB6-652	Davis	134889		/				

Supervisor's Signature

VARNER SUPERMAX JANITATION ROSTER

DATE 9-23-09OFFICER: C^o 2 P. Johnson

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-653	Craw	171351		✓				
CB6-654	Meadow	134096		✓				
CB6-655	Fowler	128222		✓				
CB6-656	Arvor	94281		✓				
CB6-657	Ellis	136795		✓				
CB6-658	Farris	131950		✓				
CB6-659	Coch	120909		✓				
CB6-660	Oxford	144649		✓				
CB6-661	Weeds	108514		✓				
CB6-662	Heaver	138075		✓				
CB6-663	Wynn	118789		✓				
CB6-664	Hall	79299		✓				
CB6-665	Yillsbury	135299		✓				
CB6-666	Whitley	138096		✓				
CB6-667	Butler	500230		✓				
CB6-668	Flowers	175069		✓				
CB6-669	Mump	172688		✓				
CB6-670	Bradley	171571		✓				
CB6-671	Booth	140482		✓				
CB6-672	LeFlore	173845		✓				
CB6-673	Jackson	119222		✓				
CB6-674	Smith	175657		✓				
CB6-675	Halbrock	120828		✓				
CB6-676	Body	107221		✓				
CB6-677	Hewins	176749		✓				
CB6-678	Bullups	130419		✓				

VARNER SUPERMAX SANITATION ROSTER

DATE 9-28-09

OFFICER: CO2 P. Johnson

Cell	Name	ADCH	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-601	Johnson	95145		<input checked="" type="checkbox"/>				
CB6-602	Roberts	127841		<input type="checkbox"/>				
CB6-603	Hamel	119952		<input type="checkbox"/>				
CB6-604	Millbrooks	137215		<input type="checkbox"/>				
CB6-605	Davis	137423		<input type="checkbox"/>				
CB6-606	Brubaker	129531		<input type="checkbox"/>				
CB6-607	Chestang	134005		<input type="checkbox"/>				
CB6-608	Jones	139723		<input type="checkbox"/>				All I/M
CB6-609	Jefferson	72821		<input type="checkbox"/>				
CB6-610	Ashford	133975		<input type="checkbox"/>				
CB6-611	Scott	108913		<input type="checkbox"/>				Cleaned cells
CB6-612	Goslar	105879		<input type="checkbox"/>				
CB6-613	Dualla	137269		<input type="checkbox"/>				
CB6-614	Moene	718958		<input type="checkbox"/>				
CB6-615	Brandon	81646		<input type="checkbox"/>				
CB6-616	Hollaway	121217		<input type="checkbox"/>				
CB6-617	Robinson	139742		<input type="checkbox"/>				
CB6-618	Johnson	120860		<input type="checkbox"/>				
CB6-619	Green	117055		<input type="checkbox"/>				
CB6-620	Von	108062		<input type="checkbox"/>				
CB6-621	Gaines	123239		<input type="checkbox"/>				
CB6-622	O'Leanne	138452		<input type="checkbox"/>				
CB6-623	Stephens	94967		<input type="checkbox"/>				
CB6-624	Duckett	113494		<input type="checkbox"/>				
CB6-625	Yonney	103847		<input type="checkbox"/>				
CB6-626	Ellis	78658		<input type="checkbox"/>				

Supervisor's Signature

[Handwritten Signature]

VARNER SUPERMAX SANITATION ROSTER

DATE 9-28-09

OFFICER: C. P. Johnson

Cell	Name	ADC#	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-627	Talley	121370		✓				
CB6-628	Verson	108271		↑				
CB6-629	Taylor	109416		}				
CB6-630	Scott	131042						
CB6-631	Taylor	136928						
CB6-632	Throuer	93952						
CB6-633	Riggie	178670						
CB6-634	Dawie	134310						
CB6-635	Hawkins	142524						
CB6-636	Whitt	137345						
CB6-637	Wardlow	140703						
CB6-638	Beal	114528						
CB6-639	Boyd	082417						
CB6-640	Shepard	127863						
CB6-641	Simmons	140732						
CB6-642	Norwan	135064						
CB6-643	Thompson	120474						
CB6-644	Gardner	112981						
CB6-645	Powell	118847						
CB6-646	Burber	087376						
CB6-647	Murray	106881						
CB6-648	Varkaway	132954						
CB6-649	Terry	112868						
CB6-650	Heinelt	119998						
CB6-651	Vonallen	131320						
CB6-652	Darius	134888		✓				

Supervisor's Signature

VARNER SUPERMAX JANITATION ROSTER

DATE 9-28-09

OFFICER: C. P. Johnson

Cell	Name	ADCH	Race	Cleaning	Shower	Grooming	Other	Comments
CB6-653	Creat	131351		/				
CB6-654	Meadows	134096		}				
CB6-655	Fowler	128222						
CB6-656	Nixon	094381						
CB6-657	Ellis	136799						
CB6-658	Farris	131956						
CB6-659	Cook	120909						
CB6-660	Oxford	144649						
CB6-661	Woodo	108514						
CB6-662	Weaver	138675						
CB6-663	Wynn	118789						
CB6-664	Hall	78294						
CB6-665	Alvarado	135299						
CB6-666	Whitley	138696						
CB6-667	Butler	500230						
CB6-668	Flowers	135869						
CB6-669	Max	132688						
CB6-670	Bradley	171571						
CB6-671	Booth	140482						
CB6-672	Leftore	137845						
CB6-673	Jackson	119222						
CB6-674	Smith	135653						
CB6-675	Hulbrook	120828						
CB6-676	Boody	107421						
CB6-677	Waring	136749						
CB6-678	Butler	130219						

Supervisor's Signature



RE: Roberts v. Hobbs, et al 5:10CV00174

Gordon S. Rather, Jr.

to:

'Christine Cryer', Courtney C. McLarty

03/04/2013 06:17 PM

Cc:

"dpmchambers@ared.uscourts.gov"

Hide Details

From: "Gordon S. Rather, Jr." <GRather@wlj.com>

To: 'Christine Cryer' <christine.cryer@arkansasag.gov>, "Courtney C. McLarty" <CMcLarty@wlj.com>,

Cc: "dpmchambers@ared.uscourts.gov" <dpmchambers@ared.uscourts.gov>

History: This message has been forwarded.

Christine

The plaintiff understandably objects to any use of documents that should have been produced in discovery, that should have been produced in response to requests contained in deposition notices, and that have not been listed in pretrial disclosures. Fairness and the Federal Rules required their production.

The problems with the medical records caused a considerable amount of additional work for appointed counsel as you are well aware. To now come up with sanitation records when that has been the focus of this case from the beginning is a real concern to say the least.

We are preparing for trial with the understanding that the witnesses and exhibits are those that have previously been disclosed. We ask that these sanitation records not be mentioned or used for any purpose until Judge Marshall has ruled on them after a hearing on why the defendants should be allowed to rely on evidence that has never been disclosed throughout an exhaustive discovery process.

We trust you appreciate the position of the plaintiff and his Court appointed counsel.

I am only copying the Court with this correspondence because you included the Court in yours.

Gordon

Gordon S. Rather, Jr.

Wright, Lindsey & Jennings LLP

200 West Capitol Avenue, Suite 2300

Little Rock, Arkansas 72201-3699

Main: (501) 371-0808

Direct: (501) 212-1267

FAX: (501) 376-9442

www.wlj.com

WLJ

WRIGHT, LINDSEY
& JENNINGS LLP

From: Christine Cryer [<mailto:christine.cryer@arkansasag.gov>]

Sent: Monday, March 04, 2013 5:43 PM

To: Gordon S. Rather, Jr.; Courtney C. McLarty