

EXHIBIT E

October 20, 2006

VIA E-MAIL MELVIN.BOLDEN@DC.GOV

Mr. Melvin W. Bolden, Jr.
Senior Assistant Attorney General
Office of the Attorney General
441 Fourth Street, N.W., Sixth Floor South
Washington, D.C. 20001

Re: Olaniyi v. District of Columbia, et al., Civil No. 05-455 (RBW)

Dear Mr. Bolden:

I am writing regarding Defendant District of Columbia's Responses to Plaintiff's Second Request for the Production of Documents to Defendant District of Columbia (the "Responses"). Specifically, I am writing because the Responses are deficient in the following ways, and I ask that you immediately address these concerns:

1. **Signature on "Diabetic Management Record."** In your initial disclosures dated September 25, 2005, you provided the Plaintiff with a copy of a form entitled "Diabetic Management Record." In the Responses, the District of Columbia states that "[t]he medical reports attached [to the initial disclosures] contain the signature of Peniannah Anuyanuwu LPN (12000), Gwendolyn Gibson, LPN (7643) and Sara Gyanyalla, RN (6118)." However, none of these names appear to be the person who signed the record on March 9, 2003 ("3/9") at "6pm." Accordingly, please promptly identify this signatory and supply the Plaintiff with this information forthwith.
2. **March 7, 2003 Chart.** Plaintiff has not been supplied with any medical chart, history, or other documentation concerning March 7, 2003, the day the Plaintiff was committed to the custody of the District of Columbia. Please provide any documentation concerning that date, including appropriate commitment orders, medical information, charts, histories, records of examination, medical test results, and/or notes, documentation, or other records relating to the Plaintiff's stay in custody on March 7, 2003, or confirm that such records do not exist.
3. **Diabetic Management Record, March 7, 2003 & March 8, 2003.** As discussed above, the District of Columbia provided the Plaintiff with a copy of a Diabetic Management Record in the initial disclosures. However, the Record begins on March

G A D W A L A D E R

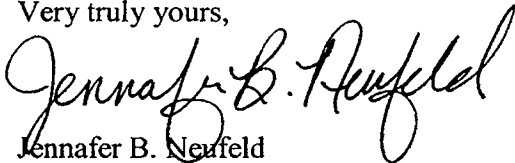
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9, 2003 and does not have information relating to any management of the Plaintiff's alleged diabetic condition on March 8, 2003. Please provide the Diabetic Management Record for March 7 and/or 8, 2003, or confirm that such records do not exist.

4. **Medical Restraint Policy.** The Responses included, at page 269 of the document production, a portion of the Medical Restraint policy. However, we were not supplied with page one of this policy. Please supply the Plaintiff with a full and complete copy of this policy as soon as possible.
5. **Forensic Information Policy.** The Responses included, at page 304 of the document production, a portion of the Forensic Information policy. However, we were not supplied with a portion of page 1, page 2 or page 3 of this policy. Accordingly, please supply the Plaintiff with a full and complete copy of this policy as soon as possible.

Please contact me if you have any questions regarding these matters. The Plaintiff looks forward to receiving this information quickly in order to remedy the District of Columbia's deficient responses to the Plaintiff's Discovery Requests.

Very truly yours,



Jennafer B. Neufeld

JBN/ajj

Copy to: Keith R. Wesolowski, Esq.