

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

Anthony Britt,  
35903 Army Navy Drive  
Mechanicsville, MD 20059  
Plaintiff,

v.

Corrections Corporation of America,  
10 Burton Hills Boulevard  
Nashville, TN 37215  
Defendant.

Civil Action No.


**NOTICE OF REMOVAL**

Defendant Corrections Corporation of America, through undersigned counsel, files this Notice of Removal of this action to United States District Court for the District of Columbia and states as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 as this action involves diversity of citizenship and an amount exceeding the sum or value of \$75,000, exclusive of interest and costs.
2. This Notice of Removal is being filed within 30 days after receipt of the Complaint. It is timely filed pursuant to 28 U.S.C. § 1446(b).
3. Plaintiff has alleged the citizenship of the parties is as follows:
  - a. Plaintiff Anthony Britt is a citizen of the State of Maryland
  - b. Defendant Corrections Corporation of America is a Maryland corporation with its principal place of business in Nashville, Tennessee.
4. A Notification of Filing of Notice of Removal in Federal Court, a true and correct copy of which is attached as "Exhibit A," has been filed in the Superior Court of the District of Columbia on behalf of Defendant.

5. A copy of the filings in the Superior Court of the District of Columbia are attached hereto as Exhibit "B."

Dated: May 26, 2011

By:   
Mariana D. Bravo, DC Bar No. 473809  
Paul J. Maloney, DC Bar No. 362533  
CARR MALONEY P.C.  
2000 L Street, NW  
Suite 450  
Washington, D.C. 20036  
Telephone: (202) 310-5500  
Facsimile: (202) 310-5555  
mdb@carrmaloney.com  
pjm@carrmaloney.com

Daniel P. Struck, Bar No. CO0037  
Jennifer L. Holsman, Bar No. 495296  
JONES, SKELTON & HOCHULI, P.L.C.  
2901 North Central Avenue  
Suite 800  
Phoenix, Arizona 85012  
Telephone: (602) 263-1700  
Facsimile: (602) 263-1784  
dstruck@jshfirm.com  
jholsman@jshfirm.com

*Attorneys for Defendant Corrections  
Corporation of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 26, 2011, a copy of the foregoing Notice of Removal was sent by first-class U.S. Mail to the following:

Geoffrey D. Allen, Esq.  
LAW OFFICES OF GEOFFREY D. ALLEN  
1730 Rhode Island Avenue, NW  
Suite 206  
Washington, D.C. 200036  
*Attorney for Plaintiff Britt*

  
\_\_\_\_\_  
Mariana D. Bravo

## **EXHIBIT A**

**SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

ANTHONY BRITT  
35903 Army Navy Drive  
Mechanicsville, MD 20059,

Plaintiff,

v.

CORRECTIONS CORPORATION OF AMERICA,  
INC.,  
10 Burton Hills Boulevard  
Nashville, TN 37215

Defendant.

C.A. No. 0003342-11

**NOTICE OF FILING NOTICE OF REMOVAL**

Defendant Corrections Corporation of America, through counsel and pursuant to 28 U.S.C. § 1441 et seq., notifies this Court that it has filed a Notice of Removal of this action to the United States District Court for the District of Columbia. A copy of the Notice of Removal filed in the United States District Court is attached as Exhibit A.

Dated: May 26, 2011

By: \_\_\_\_\_

*Jennifer Holsman*

Jennifer L. Holsman, Bar No. 495296  
JONES, SKELTON & HOCHULI, P.L.C.  
2901 North Central Avenue, Suite 800  
Phoenix, Arizona 85012  
Telephone: (602) 263-1700  
Facsimile: (602) 263-1784

Paul J. Maloney, DC Bar No. #362533  
Mariana Bravo, DC Bar No. #473809  
Carr Maloney, P.C.  
2000 L Street, NW, Suite 450  
Washington, DC 20036  
Telephone: (202) 310-5500  
Facsimile: (202) 310-5555

*Attorneys for Defendant Corrections  
Corporation of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 26, 2011, a copy of the foregoing Notice of Filing Notice of Removal was electronically served on the following parties:

Geoffrey D. Allen, Esq.  
LAW OFFICES OF GEOFFREY D. ALLEN  
1730 Rhode Island Avenue, N.W., Suite 206  
Washington, DC 200036

*Attorney for Plaintiff Britt*

  
\_\_\_\_\_  
Jennifer Holsman

## **EXHIBIT B**

## Court Cases Online

Case Search for Person: BRITT, ANTHONY

[Click here to view search criteria](#)

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[FAQs](#)

[DC Courts Home](#)

Search retrieved 31 cases in less than a second.

[Click here to view search results](#)

Selected 1 cases to view

Viewing single case; Details retrieved in less than a second.

[Click here to view case summary](#)

2011 CA 003342 B: BRITT, ANTHONY Vs. CORRECTIONS CORPORATION OF AMERICA, INC.	
Case Type: Civil II	File Date: 05/02/2011
Status: Open	Status Date: 05/02/2011
Disposition: Undisposed	Disposition Date:

Party Name	Party Alias(es)	Party Type	Attorney(s)
BRITT, ANTHONY		PLAINTIFF	ALLEN, Mr GEOFFREY D
CORRECTIONS CORPORATION OF AMERICA, INC.		Defendant	

Schedule Date	Schedule Time	Description
08/05/2011	10:00 AM	Initial Scheduling Conference-60

Docket Date	Description	Messages
05/18/2011	Proof of Service	Proof of Service Method : Service Issued Issued : 05/03/2011 Service : Summons Issued Served : 05/02/2011 Return : 05/18/2011 On : CORRECTIONS CORPORATION OF AMERICA, INC. Signed By :  Reason : Proof of Service Comment :  Tracking # : 5000096316
05/18/2011	Affidavit of Service of Summons & Complaint on	Affidavit of Service of Summons & Complaint by Mail on CORRECTIONS CORPORATION OF AMERICA, INC. (Defendant);
05/03/2011	Service Issued	Issue Date: 05/03/2011 Service: Summons Issued Method: Service Issued



		Cost Per: \$  CORRECTIONS CORPORATION OF AMERICA, INC. 1901 E Street, SE WASHINGTON, DC 20003 Tracking No: 5000096316
05/02/2011	Order Granting Motion to Proceed In Forma Pauperis Entered on the Docket	Order Granting Motion to Proceed In Forma Pauperis Entered on the Docket on 05/02/2011 Signed by J/Elperin, 04/28/2011
05/02/2011	Motion to Proceed In Forma Pauperis Filed	Motion to Proceed In Forma Pauperis Filed Attorney: ALLEN, Mr GEOFFREY D (288142) Mr GEOFFREY D ALLEN (Attorney) on behalf of ANTHONY BRITT (PLAINTIFF)
05/02/2011	Event Scheduled	Event Scheduled Event: Initial Scheduling Conference-60 Date: 08/05/2011 Time: 10:00 am Judge: CHRISTIAN, ERIK Location: Courtroom 212
05/02/2011	Complaint for Assault and Battery Filed	Complaint for Assault and Battery Filed

District of Columbia Courts (202) 879-1010 TTY TDD Directory	Telephone Directory by Topic   Site Map   D.C. Government Web Site	Moultrie Courthouse 500 Indiana Ave., N.W. Washington, D.C. 20001
	Feedback   Accessibility   Privacy & Security   Terms & Conditions	



2011 CA 003342 B  
EC

BRITT, ANTHONY Vs. CORRECTIONS CORPORATION OF AMERICA, INC.

Search Criteria

Docket Entry	<input checked="" type="checkbox"/>	Begin Date	SortDescending
Images	All Dockets	End Date	
Participant	<input checked="" type="checkbox"/>		
Display Option	Exclude Non Display Dockets		

Search Results

Docket Date	Referenc e	Description	Amt Owed/ Amt Dism/Credit	Amount Due
5/3/2011		Issue Date: 05/03/2011 Service: Summons Issued Method: Service Issued Cost Per: \$		
		CORRECTIONS CORPORATION OF AMERICA, INC. 1901 E Street, SE WASHINGTON, DC 20003 Tracking No: 5000096316		
5/2/2011		Order Granting Motion to Proceed In Forma Pauperis Entered on the Docket on 05/02/2011 Signed by J/Eilperin, 04/28/2011		
5/2/2011		Motion to Proceed In Forma Pauperis Filed Attorney: ALLEN, Mr GEOFFREY D (288142) Mr GEOFFREY D ALLEN (Attorney) on behalf of ANTHONY BRITT (PLAINTIFF)		
5/2/2011		Event Scheduled Event: Initial Scheduling Conference-60 Date: 08/05/2011 Time: 10:00 am Judge: CHRISTIAN, ERIK Location: Courtroom 212		
5/2/2011		Complaint for Assault and Battery Filed	120.00	
			120.00	

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Civil Division

W

ANTHONY BRITT  
35903 Army Navy Drive  
Mechanicsville, MD 20059

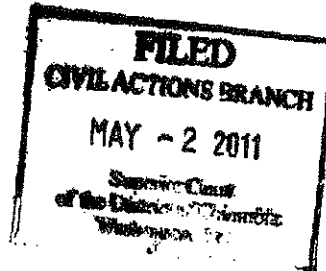
*Plaintiff,*

v.

CORRECTIONS CORPORATION  
OF AMERICA, INC.  
1901 E Street SE  
Washington, D.C. 20003

*Defendant.*

0003342-11



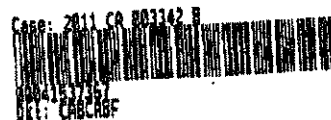
COMPLAINT

(Assault and Battery)

I. Jurisdiction

1. This is a civil action seeking compensatory damages for injuries suffered by Anthony Britt. This action arises under the common law of the District of Columbia.

2. This court has jurisdiction over this action pursuant to D.C. Code § 11-921 (1981 Edition).



## **II. Parties**

3. Plaintiff, Anthony Britt, is an adult natural person who, at all times relevant to this action, was incarcerated by the Corrections Corporation of America, Inc. (hereinafter "CCA"). He is a resident of the State of Maryland.

4. Defendant CCA is a corporation doing business in the District of Columbia. It has, and at all relevant times to this action had, responsibility for persons incarcerated at the Correctional Treatment Facility (hereinafter "CTF") a detention facility it operates in the District of Columbia, located at 1901 E St S.E.

## **III. Factual Background**

5. On June 12, 2010, at approximately 12:30 p.m. Mr. Britt was assaulted and battered, while handcuffed, by L. Johnson, Chief of Security, and Captain Andrew. L. Johnson and plaintiff had had a disagreement which ended with Johnson ordering Britt to enter his cell. When he did not immediately comply, he was handcuffed with his hands behind his back. Johnson then struck plaintiff in the mouth with a clenched fist and knocked three of his teeth loose. Andrew punched plaintiff in the ribs and left body area.

6. At the time of the assault and battery described above, both L. Johnson and Captain Andrew were employed by CCA and were acting within the scope of their employment as correctional officers.

7. From June 12, 2010 until June 14, 2010, Mr. Britt filed several inmate grievances. He was informed that an investigation into his complaints would be

conducted. Despite his requests, plaintiff was never informed of the result of the investigation. Upon information and belief, no disciplinary action was ever taken against the officers involved.

8. Plaintiff was subsequently denied dental treatment until June 17, 2010, despite his repeated requests to be seen by a dentist. When he was finally seen, three of his teeth were extracted and he was placed on a liquid diet. Mr. Britt suffered severe headaches, an inability to chew properly, and extreme pain and great embarrassment as a direct result of being punched in the mouth by L. Johnson.

### COUNT ONE

(Assault and Battery)

9. Plaintiff hereby incorporates paragraphs 1 through 8, *supra*, by reference.

10. The aforementioned officers, assaulted and battered plaintiff as described above.

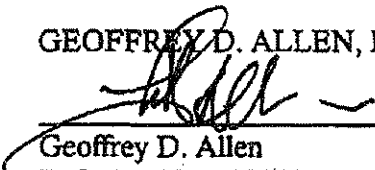
11. As a direct and proximate result of the aforesaid assault and battery, plaintiff experienced great bodily pain, extreme mental anguish and embarrassment and will incur substantial expenses in the future for corrective dental treatment.

**WHEREFORE**, plaintiff prays for a judgment against defendant CCA awarding compensatory damages in the amount of \$500,000 (Five Hundred

Thousand Dollars), costs of this suit, the costs of future dental treatment and any other relief deemed appropriate by the court.

Respectfully Submitted,

GEOFFREY D. ALLEN, ESQ.



---

Geoffrey D. Allen  
D.C. Bar No. 288142  
1730 Rhode Island Ave, NW  
Suite 206  
Washington, DC 20036  
(202) 778-1167

**JURY DEMAND**

Plaintiff demands trial by jury as to all counts herein.



---

Geoffrey D. Allen



Superior Court of the District of Columbia  
 CIVIL DIVISION  
 500 Indiana Avenue, N.W., Suite 5000  
 Washington, D.C. 20001 Telephone: (202) 879-1133

Anthony Britt

Plaintiff

0003342-11

vs.

Case Number

Correction Corporation of America Inc.  
 Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty (20) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the party plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within five (5) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Geoffrey Allen

Name of Plaintiff's Attorney

1730 Rhode Island Ave NW

Address

Washington D.C. 20036

202 778 1167

Telephone

如需翻译, 请拨打 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828 로 전화하십시오. የአግርኛ ትርጉም ለማግኘት (202) 879-4828 ይጻፉ

Clerk of the Court

By

Deputy Clerk

Date

05/02/2011

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-682-2700) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation  
 Vea al dorso la traducción al español

# Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH

INFORMATION SHEET

Anthony Britt

0003342-11

Case Number: \_\_\_\_\_

vs

Date: \_\_\_\_\_

Correction Corporation of America Inc.  One of the defendants is being sued  
in their official capacity.

Name: (please print) <u>Geoffrey Allen</u>	Relationship to Lawsuit <input type="checkbox"/> Attorney for Plaintiff
Firm Name: <u>Geoffrey Allen esquire 288142</u>	<input type="checkbox"/> Self (Pro Se)
Telephone No.: <u>202-778-1167</u>	Other: _____
Six digit Unified Bar No.:	

TYPE OF CASE:  Non-Jury  6 Person Jury  12 Person Jury  
Demand: \$ 500,000.00 Other: \_\_\_\_\_

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar #: \_\_\_\_\_

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar #: \_\_\_\_\_

NATURE OF SUIT: (Check One Box Only)		
<b>A. CONTRACTS</b> <input type="checkbox"/> 01 Breach of Contract <input type="checkbox"/> 02 Breach of Warranty <input type="checkbox"/> 06 Negotiable Instrument <input type="checkbox"/> 15 _____	<input type="checkbox"/> 07 Personal Property <input type="checkbox"/> 09 Real Property-Real Estate <input type="checkbox"/> 12 Specific Performance	<b>COLLECTION CASES</b> <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent <input type="checkbox"/> 16 Under \$25,000 Consent Denied <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent
<b>B. PROPERTY TORTS</b> <input type="checkbox"/> 01 Automobile <input type="checkbox"/> 02 Conversion <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102(a)	<input type="checkbox"/> 03 Destruction of Private Property <input type="checkbox"/> 04 Property Damage	<input type="checkbox"/> 05 Trespass <input type="checkbox"/> 06 Traffic Adjudication
<b>C. PERSONAL TORTS</b> <input type="checkbox"/> 01 Abuse of Process <input type="checkbox"/> 02 Alienation of Affection <input checked="" type="checkbox"/> 03 Assault and Battery <input type="checkbox"/> 04 Automobile-Personal Injury <input type="checkbox"/> 05 Deceit (Misrepresentation) <input type="checkbox"/> 06 False Accusation <input type="checkbox"/> 07 False Arrest <input type="checkbox"/> 08 Fraud	<input type="checkbox"/> 09 Harassment <input type="checkbox"/> 10 Invasion of Privacy <input type="checkbox"/> 11 Libel and Slander <input type="checkbox"/> 12 Malicious Interference <input type="checkbox"/> 13 Malicious Prosecution <input type="checkbox"/> 14 Malpractice Legal <input type="checkbox"/> 15 Malpractice Medical (including wrongful death) <input type="checkbox"/> 16 Negligence-(Not Automobile, Not Malpractice)	<input type="checkbox"/> 17 Personal Injury - (Not Automobile, Not Malpractice) <input type="checkbox"/> 18 Wrongful Death (Not malpractice) <input type="checkbox"/> 19 Wrongful Eviction <input type="checkbox"/> 20 Friendly Suit <input type="checkbox"/> 21 Asbestos <input type="checkbox"/> 22 Toxic/Mass Torts <input type="checkbox"/> 23 Tobacco <input type="checkbox"/> 24 Lead Paint

SEE REVERSE SIDE AND CHECK HERE  IF USED





SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION

ANTHONY BRITT

Vs.

C.A. No. 2011 CA 003342 B

CORRECTIONS CORPORATION OF AMERICA, INC.

**INITIAL ORDER AND ADDENDUM**

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("SCR Civ") 40-I, it is hereby **ORDERED** as follows:

(1) Effective this date, this case has assigned to the individual calendar designated below. All future filings in this case shall bear the calendar number and the judge's name beneath the case number in the caption. On filing any motion or paper related thereto, one copy (for the judge) must be delivered to the Clerk along with the original.

(2) Within 60 days of the filing of the complaint, plaintiff must file proof of serving on each defendant: copies of the Summons, the Complaint, and this Initial Order. As to any defendant for whom such proof of service has not been filed, the Complaint will be dismissed without prejudice for want of prosecution unless the time for serving the defendant has been extended as provided in SCR Civ 4(m).

(3) Within 20 days of service as described above, except as otherwise noted in SCR Civ 12, each defendant must respond to the Complaint by filing an Answer or other responsive pleading. As to the defendant who has failed to respond, a default and judgment will be entered unless the time to respond has been extended as provided in SCR Civ 55(a).

(4) At the time and place noted below, all counsel and unrepresented parties shall appear before the assigned judge at an Initial Scheduling and Settlement Conference to discuss the possibilities of settlement and to establish a schedule for the completion of all proceedings, including, normally, either mediation, case evaluation, or arbitration. Counsel shall discuss with their clients **prior** to the conference whether the clients are agreeable to binding or non-binding arbitration. **This order is the only notice that parties and counsel will receive concerning this Conference.**

(5) Upon advice that the date noted below is inconvenient for any party or counsel, the Quality Review Branch (202) 879-1750 may continue the Conference **once**, with the consent of all parties, to either of the two succeeding Fridays. Request must be made not less than six business days before the scheduling conference date. No other continuance of the conference will be granted except upon motion for good cause shown.

(6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each Judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Lee F. Satterfield

Case Assigned to: Judge ERIK CHRISTIAN

Date: May 2, 2011

Initial Conference: 10:00 am, Friday, August 05, 2011

Location: Courtroom 212

500 Indiana Avenue N.W.

WASHINGTON, DC 20001

Cain doc

**ADDENDUM TO INITIAL ORDER AFFECTING  
ALL MEDICAL MALPRACTICE CASES**

In accordance with the Medical Malpractice Proceedings Act of 2006, D.C. Code § 16-2801, et seq. (2007 Winter Supp.), "[a]fter an action is filed in the court against a healthcare provider alleging medical malpractice, the court shall require the parties to enter into mediation, without discovery or, if all parties agree[,] with only limited discovery that will not interfere with the completion of mediation within 30 days of the Initial Scheduling and Settlement Conference ("ISSC"), prior to any further litigation in an effort to reach a settlement agreement. The early mediation schedule shall be included in the Scheduling Order following the ISSC. Unless all parties agree, the stay of discovery shall not be more than 30 days after the ISSC." D.C. Code § 16-2821.

To ensure compliance with this legislation, on or before the date of the ISSC, the Court will notify all attorneys and *pro se* parties of the date and time of the early mediation session and the name of the assigned mediator. Information about the early mediation date also is available over the internet at <https://www.dccourts.gov/pa/>. To facilitate this process, all counsel and *pro se* parties in every medical malpractice case are required to confer, jointly complete and sign an EARLY MEDIATION FORM, which must be filed no later than ten (10) calendar days prior to the ISSC. Two separate Early Mediation Forms are available. Both forms may be obtained at [www.dccourts.gov/medmalmediation](http://www.dccourts.gov/medmalmediation). One form is to be used for early mediation with a mediator from the multi-door medical malpractice mediator roster; the second form is to be used for early mediation with a private mediator. Both forms also are available in the Multi-Door Dispute Resolution Office, Suite 105, 515 5th Street, N.W. (enter at Police Memorial Plaza entrance). Plaintiff's counsel is responsible for eFiling the form and is required to e-mail a courtesy copy to [earlymedmal@dsc.gov](mailto:earlymedmal@dsc.gov). *Pro se* Plaintiffs who elect not to eFile may file by hand in the Multi-Door Dispute Resolution Office.

A roster of medical malpractice mediators available through the Court's Multi-Door Dispute Resolution Division, with biographical information about each mediator, can be found at [www.dccourts.gov/medmalmediation/mediatorprofiles](http://www.dccourts.gov/medmalmediation/mediatorprofiles). All individuals on the roster are judges or lawyers with at least 10 years of significant experience in medical malpractice litigation. D.C. Code § 16-2823(a). If the parties cannot agree on a mediator, the Court will appoint one. D.C. Code § 16-2823(b).

The following persons are required by statute to attend personally the Early Mediation Conference: (1) all parties; (2) for parties that are not individuals, a representative with settlement authority; (3) in cases involving an insurance company, a representative of the company with settlement authority; and (4) attorneys representing each party with primary responsibility for the case. D.C. Code § 16-2824.

No later than ten (10) days after the early mediation session has terminated, Plaintiff must eFile with the Court a report prepared by the mediator, including a private mediator, regarding: (1) attendance; (2) whether a settlement was reached; or, (3) if a settlement was not reached, any agreements to narrow the scope of the dispute, limit discovery, facilitate future settlement, hold another mediation session, or otherwise reduce the cost and time of trial preparation. D.C. Code § 16-2826. Any Plaintiff who is *pro se* may elect to file the report by hand with the Civil Clerk's Office. The forms to be used for early mediation reports are available at [www.dccourts.gov/medmalmediation](http://www.dccourts.gov/medmalmediation).

Chief Judge Lee F. Satterfield

Monday, April 26, 2010

### Client Authorization and Limited Power of Attorney

Wanda Johnson  
126-35th Street South East - Apt. 301  
Washington, DC 20019

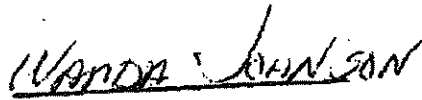
To whom it may concern:

I/We, appoint Contego Law to act on my/our behalf pertaining to creditor claims of indebtedness. I/we employ Contego Law to communicate with creditors and their agents for the purpose of negotiating settlement arrangements on creditors' claims of indebtedness. If necessary, I/we authorize Contego Law to issue orders to cease communication between creditors and creditors' agents and me/us. I/we request that creditors and their agents contact Contego Law in reference to any of my accounts as authorized by my/our signature(s) below. I/we grant Contego Law full power and authority to act on my/our behalf and perform each and every act which may be necessary or convenient in connection with any of the foregoing, to all intents and purposes, as I/we might or could do if personally present, hereby ratifying and confirming that Contego Law shall lawfully do or cause to be done by authority hereof. Any reference to Contego Law includes its employees.

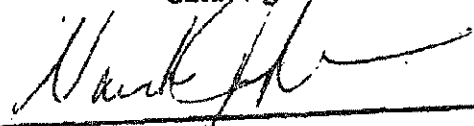
My/Our Authorization(s):

  
\_\_\_\_\_

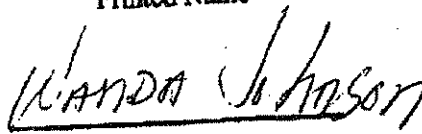
Client Signature



Printed Name

  
\_\_\_\_\_

Client Signature



Printed Name

\*\*\*Please note that I request that all communication from creditors and their agents, written and verbal, be directed to Contego Law and/or their agents. This action is required to assure proper and efficient handling of this matter. \*\*\*



**C O N T E G O**  
**L A W P.C.**

220 Newport Center Dr. Suite 11-900  
Newport Beach, CA 92660  
Telephone: (800) 660.8055  
Facsimile: (800) 926.1146  
Email: [customerservice@contegalaw.com](mailto:customerservice@contegalaw.com)

[www.CONTEGOLAW.com](http://www.CONTEGOLAW.com)

---

April 18, 2011

Dear Wanda Johnson,

Attached you will find two (2) copies of the **CLIENT FINANCIAL SUMMARY** to be completed at your earliest convenience. The hardship explanation is the most important section of the summary that you will need to complete. You will return one (1) copy to Contego Law, P.C. as soon as possible due to the time sensitive nature of this request. To help expedite this process you can fax a copy of this document to our office for review. After the document is approved by our office you will then be contacted to confirm that the second copy of the **CLIENT FINANCIAL SUMMARY** can be completed and sent along with the filing to the courts and with the copy filed with the plaintiff's attorney as instructed in your **SUMMONS RESPONSE PACKET**. Listed below you will find our address and fax number for your reference after the summary is complete. If you have any questions regarding the financial summaries please contact our office to discuss in further details.

**CONTEGO LAW, P.C.**  
220 Newport Center Drive, Suite 11-900  
Newport Beach, CA. 92660

Fax: 800-926-1146

Sincerely,

Contego Law PC  
Client Services

Monday, April 18, 2011

## *Client Financial Summary*

Wanda Johnson

### Hardship

<input type="radio"/> Job Loss <input type="radio"/> Pay Cut <input type="radio"/> Divorce/Separation <input type="radio"/> Medical	<input type="radio"/> Mortgage <input type="radio"/> Legal Issues <input type="radio"/> IRS/Tax <input type="radio"/> Business	<input type="radio"/> Gambling <input type="radio"/> Student Loan <input type="radio"/> Death <input type="radio"/> Other
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**Explanation:** DUE TO ECONOMY JOB HOURS AND WAGES WERE REDUCED.  
DENTAL AND MEDICAL BILLS WERE COSTLY. HOURS ON JOB WERE RESTORED  
AND I AM MAKING EVERY EFFORD TO REPAY.

### INCOME

Alimony/Child Support	\$0.00
Investments	\$0.00
Other Income	\$0.00
Pension	\$0.00
Public Assistance	\$0.00
Social Security/Disability	\$0.00
Wages-Applicant	\$1,200.00
Wages-Co-app	\$0.00
<b>Total Monthly Income</b>	<b>\$1,200.00</b>

### EXPENSES

Homeowner's Insurance	\$0.00
Mortgage/Rent	\$800.00
Real Estate Taxes	\$0.00
Repairs/Maintenance Fec	\$0.00
Disability Insurance	\$0.00
Health Insurance	\$0.00
Medication	\$0.00

Child Care	\$0.00
Child Support/Alimony	\$0.00
Education/Adult	\$0.00
Food, Clothing, and Necessities	\$100.00
Life Insurance	\$0.00
Miscellaneous	\$0.00
Car Insurance	\$0.00
Car Payments	\$0.00
Repairs and Maintenance (including Gas)	\$0.00
Elec., Water, Gas, Phone, Cable, etc.	\$0.00
<b>Total Monthly Expenses</b>	<b>\$900.00</b>

Monday, April 18, 2011

**PERSONAL PROPERTY**

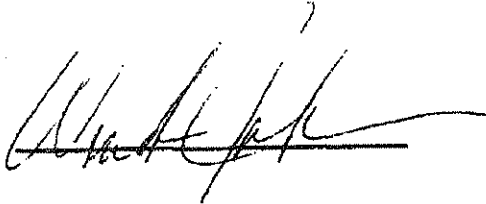
Cash/Bank Accounts	\$0.00
Home Equity	\$0.00
Personal Property	\$0.00
Savings Account	\$0.00
Stocks/401K	\$0.00
Vehicles	\$0.00
<b>Total Personal Property</b>	<b>\$0.00</b>

**SUMMARY**

Total Monthly Income	\$1,200.00
Total Monthly Expenses	\$900.00
<b>Cash Flow</b>	<b>\$300.00</b>

I certify that I have read the foregoing Client Financial Summary and to the best of my knowledge the information is accurate.

Client Signature



Co Client Signature \_\_\_\_\_

CERTIFICATE OF SERVICE

A COPY OF THE FOREGOING WILL BE MAILED TO THE FOLLOWING PERSON(S) IN THIS CASE:

STUART BLATT

110 WEST ROAD, SUITE 222

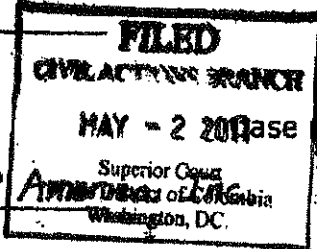
TOWNSON, MD 21204

*Wade Johnson*  
*4/30/11*



**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
FAMILY COURT and CIVIL DIVISION**

Anthony Britt  
Plaintiff/Petitioner



0003342-11

v.

Correction Corporation of America  
Defendant/Respondent

Case No: \_\_\_\_\_  
Superior Court  
of the District of Columbia  
Washington, DC

**APPLICATION TO PROCEED WITHOUT PREPAYMENT  
OF COSTS, FEES, OR SECURITY (In Forma Pauperis)  
Form 106A**

I, Anthony Britt am the (check one)  
 Plaintiff/Petitioner     Defendant/Respondent

I need an interpreter for this case. I speak the following language:  
\_\_\_\_\_ [Insert Language].

I respectfully ask permission to proceed in this case without pre-paying costs or fees and without giving security for them because I am not able to do so without substantial hardship to myself or to my family. In support of this request, I state the following:

Check and answer only those that apply.

**INCOME**

1. I receive the following public benefits, and the law presumes that I am eligible to proceed without prepayment of costs, fees, or security (see D.C. Code § 15-712):

- Temporary Assistance for Needy Families (TANF)
- General Assistance for Children (GAC)
- Program on Work, Employment and Responsibility (POWER)
- Supplemental Security Income (SSI)



2. Even though I do not receive the above public benefits, I receive the following similar benefits and, therefore, request that my Application be approved:

- Interim Disability Assistance (IDA) because my SSI application has not been approved/certified
- Medicaid
- DC Healthcare Alliance or the following similar health benefits (describe) \_\_\_\_\_

If you checked any of the above boxes, you do not need to answer any more questions and may skip to the section called "Declaration." Otherwise, you must answer the rest of the questions on this form. If additional information is required, you will be notified.

3. My total income over the past 12 months from all sources (including, but not limited to, my job, other wages or business income, rental income, pensions, annuities or life insurance payments, worker's compensation, unemployment compensation or insurance, annual interest or dividends, gifts, alimony or spousal support, inheritance or trust income) is \$ 0.

4. I am presently unemployed. The last date I worked was on March, 2010.  
Month Year

*Was recently released from jail looking for employment.*

**DEPENDENTS**

5. How many people live in your household and depend on you for support: 0. Of these people, how many are minor children or elderly? \_\_\_\_\_.

**ASSETS**

6. I state the following about my property:

I have \$ 0 in cash, including money in savings or checking accounts.

I own the vehicles, personal home, other real estate, stock, bonds, or other valuable property, besides household furnishings and clothing, listed below:

N/A

List the Property

**EXPENSES**

7. This is my best estimate of the monthly expenses for myself and the people in my household who depend on me for support:

N/A

Housing (rent, mortgage, taxes, & insurance): \$ \_\_\_\_\_

Public Transportation and Gasoline: \$ \_\_\_\_\_

Automobile Loan, Insurance, Maintenance: \$ \_\_\_\_\_

Health (medical, dental, vision, prescriptions, insurance): \$ \_\_\_\_\_

Food and other Household Necessities: \$ \_\_\_\_\_

Utilities (including gas, electric, water, phone, internet): \$ \_\_\_\_\_

Clothing: \$ \_\_\_\_\_

Child Support: \$ \_\_\_\_\_

Childcare (including diapers, daycare): \$ \_\_\_\_\_

Other (explain in detail): \$ \_\_\_\_\_

**Total Estimated Monthly Expenses: \$ \_\_\_\_\_**

**OTHER SPECIAL CIRCUMSTANCES**

8. (Optional) Explain any other special circumstances that you want to have considered in support of your request, including any large monthly expenses, debts, wage or bank account garnishments, and/or judgments.

I was recently released from jail and actively seeking employment. Currently I am dependent upon family and friends for living assistance, room board etc.

**DECLARATION**

**REQUIRED:** I solemnly swear or affirm under criminal penalties for the making of a false statement, which includes 180 days in jail or a \$1,000 fine or both, that I have read this Application and that the factual statements made in it are true to the best of my personal knowledge, information and belief.<sup>1</sup>

Anthony Britt / CNI  
Signature

35903 Army Navy Dr Mechanicsville, Md.  
Address 20659

301 803 6949  
Phone Number

4/28/11  
Date

**POINTS AND AUTHORITIES IN SUPPORT OF APPLICATION TO  
PROCEED WITHOUT PREPAYMENT OF COSTS, FEES, OR SECURITY**

1. D.C. Code § 15-712.
2. D.C. Code § 22-2405.
3. Civil Rule 54-II, Domestic Relations Proceedings Rule 54-II, and Family Rule R.
4. *Adkins v. E.I. Du Pont de Nemours & Co., Inc.*, 335 U.S. 331 (1948).
5. *Harris v. Harris*, 137 U.S. App. D.C. 318, 322, 424 F.2d 806 (1970), *cert. denied*, 400 U.S. 826 (1970) ("*in forma pauperis* relief not limited to those who are public charges or absolutely destitute").
6. *Green v. Green*, 562 A.2d 1214 (D.C. 1989) (statute "effectuates the fundamental principle that every litigant should be provided equal access to the courts without regard to financial ability").
7. *Herbin v. Hoeffel*, 727 A.2d 883, 887 (D.C. 1999) (court officers serve process in *in forma pauperis* cases).
8. *Cabillo v. Cabillo*, 317 A.2d 866, 866 (D.C. 1974) (per curiam) (reversing denial of *in forma pauperis* status and mandating granting of petition where litigant's income "only slightly above the welfare standard").

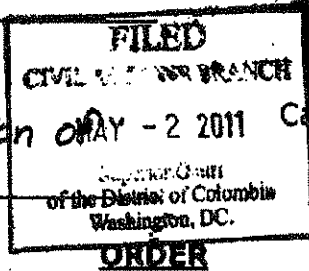
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<sup>1</sup> When you come to court, you may be asked questions about this Application. If your responses are not truthful, you could face additional criminal penalties.

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
FAMILY COURT and CIVIL DIVISION

Anthony Britt  
Plaintiff/Petitioner

Correction Corporation of  
America Inc.  
Defendant/Respondent



0003342-11

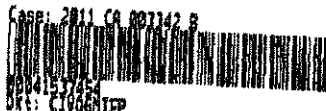
Case No. \_\_\_\_\_

Having considered  Plaintiff/Petitioner's  Defendant/Respondent's Application to Proceed without Prepayment of Costs, Fees, or Security, it is hereby ordered that the Application is:

- GRANTED** in this Family Court case and, pursuant to Domestic Relations Rule 54-II, witnesses will be subpoenaed without prepayment of witness fees;
- GRANTED** in this Civil Division case and, pursuant to Civil Rule 54-II, the officers of the Court will issue and serve all process; witnesses will be subpoenaed without prepayment of witness fees;
- DENIED**
  - For the following reasons: \_\_\_\_\_
  - For the reasons stated on the record in open court and in the presence of the applicant or his or her counsel;

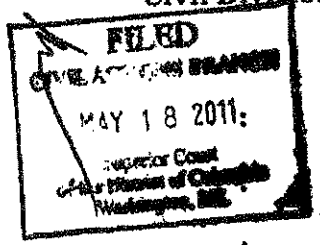
4/28/11  
Date

[Signature]  
Judge



IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA  
Civil Division

W



ANTHONY BRITT

Plaintiff,

v.

: 2011 CA 003342

CORRECTIONS CORPORATION

Defendant.

: Next Event: Scheduling  
conference 10 am August 5, 2011

Affidavit of Service

I am not a party and am not less than 18 years of age;

I certify that a copy of the complaint, summons and initial scheduling order in this case has been served on Corrections Corporation of America.

Service was made by certified mail on May 2, 2011, which was accepted by a person over the age of 18, at 1901 E Street SE Washington D.C. 20003. See exhibit attached hereto.

I hereby swear and affirm that the foregoing statements are true and correct to the best of my knowledge and belief.

*Cait McTague 5/17/2011*  
Caitlin McTague  
1730 Rhode Island Ave. NW  
Washington D.C. 20036  
(202) 778-1167

Subscribed and sworn to before me this 17 day of May, 2011.

My commission expires June 14, 2012  
*James Van Zandt*  
Notary Public, District of Columbia  
My Commission Expires 6/14/2012





## Track & Confirm

### Search Results

Label/Receipt Number: 7009 1680 0002 5024 0307

Expected Delivery Date: May 3, 2011

Class: First-Class Mail®

Service(s): Certified Mail™

Return Receipt

Status: Delivered

### Track & Confirm

Enter Label/Receipt Number.

[Go >](#)

Your item was delivered at 10:40 am on May 04, 2011 in WASHINGTON, DC 20024.

### Detailed Results:

- Delivered, May 04, 2011, 10:40 am, WASHINGTON, DC 20024
- Arrival at Unit, May 03, 2011, 8:50 am, WASHINGTON, DC 20024
- Acceptance, May 02, 2011, 2:06 pm, WASHINGTON, DC 20036

### Notification Options

Track & Confirm by email

Get current event information or updates for your item sent to you or others by email.

[Go >](#)

