

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEON PATRICK,)	
)	
<i>Plaintiff,</i>)	No. 14 C 3658
v.)	
)	Honorable Ronald A. Guzman
CITY OF CHICAGO, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF PATRICK’S AMENDED RESPONSE TO
DEFENDANT VILLARDITA’S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Deon Patrick, through undersigned counsel, hereby responds to the First Set of Interrogatories of Defendant Anthony Villardita (“Villardita”). Plaintiff reserves the right to supplement his interrogatory responses.

RESPONSES

INTERROGATORY NO. 1:

List the names, addresses, and telephone numbers of all persons who have knowledge of any facts relating to the occurrence(s) forming the basis for plaintiff s Complaint and/or any injuries sought thereunder, the relationship of that person to the plaintiff, and the precise subjects on which said persons have knowledge.

ANSWER: See Patrick’s Rule 26(a)(1) Disclosure.

INTERROGATORY NO. 2:

State your full name, date and place of birth, social security number, driver’s license number, your marital status and date of said marriage, the name of your spouse or partner, present residential address, and all past residential addresses you have had within the last thirty (30) years, and if you have been known by any other name or whether you have given anyone another name for any purpose, please state all names by which you have been known, including nicknames, the dates of use of each such name, and the reasons for any change or use of such name.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Federal Rule of Civil Procedure 33 (“Rule 33”).

Without waiving the objection, Plaintiff states:

- A. **Full Name:** Deon Patrick
- B. **Date of Birth:** [REDACTED]
- C. **Place of Birth:** Chicago, IL
- D. **SSN:** [REDACTED]
- E. **DL#:** [REDACTED]
- F. **Marital Status:** Single
- G. **Name of Spouse:** N/A
- H. **Present Residence:** [REDACTED] [REDACTED]
- I. **All Past Residences:** Object as burdensome; object as information is already known to the defendants; without waiving the objection, from December 2, 1992 to January 10, 2014, Mr. Patrick lived at either the Cook County Jail or with the Illinois Department of Corrections, including but not limited to Menard, Stateville, and Pontiac.
- J. **Known by any other name:** None, except for this case, I was assigned the name “C-Deon.”
- K. **Given any other name:** Sam Patrick, Gerald Taylor, Curtis Browley, Dion Brown.
- L. **Nicknames:** None.
- M. **Dates of use:** 1990-1991. Have no memory of more specific dates.
- N. **Reasons for name change:** Arrested, and did not want to give real name.

INTERROGATORY NO. 3:

Identify the names and addresses of educational institutions you attended, dates of attendance, degrees, certifications or diplomas received (if any) from each institution, when received, and whether you were ever the subject of discipline at any of these institutions. If there was discipline from any institution, please describe the subject of the discipline, date of discipline and final result of the disciplinary action.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Without waiving the objection, Plaintiff states:

- A. Attended William Penn (K-6); LeMoyne (6-7); Louis J. Agassiz (7-8).**
- B. Attended Lincoln Park High School (9-12).**
- C. No degrees.**
- D. No certification.**
- E. GED from IDOC.**
- F. Suspended in high school a couple of times.**
- G. Discipline details: Don't remember details.**

INTERROGATORY NO. 4:

Describe in detail and in chronological order each occupation, job, or other source of income you had (legal or otherwise) from five years prior to December 2, 1992 to present, including any employment, whether paid or unpaid during your incarceration, and with respect to each such occupation, job, or other source of income, state the nature and general duties of such occupation, job, or source of income, the name and address of the occupation, job, or provider of such source of income, the date of commencement and termination of such occupation, job, or other source of income, and the rate of compensation (or total compensation earned) for each such occupation, job, or other source of income.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Without waiving the objection, Plaintiff

states:

1. During high school, I sold carpets for about two weeks.
2. After my mom died in 1988, I received social security death benefits.
3. Street income from drug sales.
4. In Stateville, I had gallery jobs, such as picking trash and cleaning up.
5. In Stateville, I worked in the hospital as a hospital porter.
6. In Menard, I worked in the inmate commissary and inmate kitchen, passing out food and cleaning up.
7. Currently, Outreach Specialist for Operation Ceasefire Rogers Park; we reach out to high risk individuals in the neighborhood; attempt to hook them up with gainful employment; attempt to keep them off the streets; for those on the streets, attempt to get them not to engage with other gangs and gang members.

INTERROGATORY NO. 5:

Are you a member or have you been involved in any social, athletic, educational, religious or other activities since December 3, 1992 to present? If so, state:

- (a) the nature of each activity, including title held, if any;
- (b) the association or organization under which each activity was organized;
- (c) the location of the place or places where each activity is/was undertaken; and
- (d) the length of time and the frequency in which you have engaged in such activity.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff objects to this interrogatory because the words “other activities” because it is hopelessly vague and incapable of being answered. (Does it include eating a bowl of cereal? Does it include going to the bathroom?

Does it include picking up litter from the ground?). Without waiving either of these objections, Plaintiff states:

A. Social Organizations

(a) None.

(b) None.

(c) None.

(d) None.

B. Athletic Organizations

(a) None.

(b) None.

(c) None.

(d) None.

C. Educational Organizations

(a) None

(b) None

(c) None

(d) None

(e) None

D. Religious Organizations

(a) None, with the exception of going to chapel while in IDOC.

(b) None.

(c) None.

(d) None.

INTERROGATORY NO. 6:

Have you ever been convicted of: (1) any felony; or (2) a misdemeanor involving dishonesty or false statement? If so, state the nature thereof, the date of the conviction, and the court and the caption in which the conviction occurred. For the purpose of this interrogatory, a plea of guilty or finding of guilty shall be considered a conviction.

ANSWER: See Bates # DEON000046-57, DEON013774, and CityDef000490-92.

INTERROGATORY NO. 7:

Have you ever been arrested or in custody for any crime prior to December 2, 1992 (including any traffic offenses or ordinance violations)? Is so, state:

- (a) The date and location of any such arrest or occurrence;
- (b) The charges placed, if any;
- (c) The name and location of each court where you were prosecuted;
- (d) The court file and/or docketed number;
- (e) The disposition of any such arrest or occurrence, including any and all fines or sentences imposed; and
- (f) The name and address of any attorneys who represented you.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff further objects to this interrogatory because it does not seek admissible evidence or information likely to lead to admissible evidence. Plaintiff further objects because the interrogatory in that much of this information is as easily obtained by the defendants and their counsel as it is Plaintiff.

Without waiving these objections, Plaintiff states:

- (a) Don't recall.
- (b) See Bates Number DEON000046-57, DEON013774, and CityDef000490-92.
- (c) See Bates Number DEON000046-57, DEON013774, and CityDef000490-92.
- (d) See Bates Number DEON000046-57, DEON013774, and CityDef000490-92.
- (e) See Bates Number DEON000046-57, DEON013774, and CityDef000490-92. I

recall receiving five years boot camp for a drug crime and robbery. Otherwise, don't recall.

(f) **Sheila Kalish.**

INTERROGATORY NO. 8:

Have you ever been arrested or in custody for any crime since your release from custody on January 10, 2014 (including any traffic offenses or ordinance violations)? Is so, state:

- (a) The date and location of any such arrest or occurrence;
- (b) The charges placed, if any;
- (c) The name and location of each court where you were prosecuted;
- (d) The court file and/or docketed number;
- (e) The disposition of any such arrest or occurrence, including any and all fines or sentences imposed; and
- (f) The name and address of any attorneys who represented you.

ANSWER: Plaintiff further objects to this interrogatory because it does not seek admissible evidence or information likely to lead to admissible evidence. Plaintiff further objects because the interrogatory in that much of this information is as easily obtained by the defendants and their counsel as it is Plaintiff. Without waiving these objections, Plaintiff states, "None." Plaintiff further states:

- (a) N/A
- (b) N/A
- (c) N/A
- (d) N/A
- (e) N/A
- (f) N/A

INTERROGATORY NO. 9:

Were you or anyone you know charged, indicted or brought before a Grand Jury in connection to the murders of Jeffrey Lassiter and Sharon Haugabook? [Seriously, you are asking this question?]

If so, please provide the date(s) and the names of anyone you know who was charged, indicted or brought before a Grand Jury in connection to the murders of Jeffrey Lassiter and Sharon Haugabook.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff further objects because the interrogatory is harassing in that all of this information is as easily obtained by the defendants and their counsel as it is Plaintiff. Without waiving these objections, Plaintiff states:

(a) Were you Charged in connection to the Murder of Lassiter: *See* DEON46-56.

(b) Were you Charged in connection to the Murder of Haugabook: DEON46-56.

(c) Were you Indicted in connection to the Murder of Lassiter: DEON46-56.

(d) Were you Indicted in connection to the Murder of Haugabook: DEON46-56.

(e) Were you Brought before the Lassiter/Haugabook grand jury: No.

(g) Was anyone you know Charged in connection with Lassiter's Murder:

I knew all the persons charged with Lassiter's murder except Mixon, who I had seen in the neighborhood but never conversed with.

(h) Was anyone you know Charged in connection with Haugabook's Murder

I knew all the persons charged with Haugabook's murder except Mixon, who I had seen in the neighborhood but never conversed with.

(i) Was anyone you know Indicted in connection with Lassiter's Murder:

I knew all the persons indicted except Mixon, who I had seen in the neighborhood but never had a conversation with.

(j) Was anyone you know Indicted in connection with Haugabook's Murder:

I knew all the persons indicted except Mixon, who I had seen in the neighborhood but never had a conversation with.

(k) Was anyone you know brought before the Lassiter/Haugabook grand jury:

I knew Michael Seymore.

By the time O'Connor testified in the grand jury, I knew who he was because he had participated in my interrogation.

INTERROGATORY NO. 10:

Describe in detail any and all interactions, relationships, conversations or encounters of any type you have had with any of the Defendant Officers occurring prior to December 2, 1992, the nature of such interactions, relationships, conversations or encounters, and the dates of such interactions, relationships, conversations or encounters.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Without waiving this objection, Plaintiff states:

I had no relationship with any of the Defendant Officers prior to December 2, 1992. I have no memory of having any interactions, conversations, or encounters with them prior to that date.

INTERROGATORY NO. 11:

Please provide the dates prior to and including December 2, 1992, for each occasion that you were imprisoned, incarcerated, or jailed, the name of the facility of such confinement, the underlying charge or conviction for which such confinement related, the date and time of release from confinement, and the names of any person(s) with whom you shared a cell, including the dates during which you shared a cell with said person(s).

ANSWER: See Response to Interrogatory #7.

INTERROGATORY NO. 12:

Identify the name of the correctional facility where you confined from December 2, 1992 to January 10, 2014, including the dates during which you were confined at each correctional facility, and provide the names of each person(s) with whom you shared a cell during your confinement at each correctional facility, including the dates during which you shared a cell with said person(s).

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff further objects because all of this information is as easily obtained by the defendants and their counsel as it is Plaintiff. Without waiving these objections, Menard, Stateville, Pontiac, Joliet, and Cook County Jail, and to the best of my memory at this time my cellies were:

Menard: Lem Africa.

Stateville: Chris; Al; Little Ron; Bob.

Pontiac: Bolo, Nate, James, Martis, Bale.

Joliet: Do not remember; I was only there 3-4 days in 1995.

The County: Rodney Mathews; Boo; Loco; Sherman.

INTERROGATORY NO. 13:

Were you a DCFS ward? If so, then state the date when you officially became a ward, the name(s) of the DCFS employee(s) assigned to you once you became a ward, and the name of any facility where you housed after you became a DCFS ward, including the dates when you housed in any such facility.

ANSWER: No.

A) N/A

B) N/A

C) N/A

D) N/A

INTERROGATORY NO. 14:

State whether you have ever been a member of (or affiliated with) any street gang (including, but not limited to the Vice Lords)? If so, identify the name of any such gang and/or organization, the date of each membership/affiliation, your rank or position(s) within the street gang and/or organization.

ANSWER: Yes.

A) Name: The Conservative Vice Lords.

B) Date: Don't recall the dates I joined or dropped out.

C) Rank/Pos.: I didn't have a rank, but the police sometime refer to the position I held as foot soldier.

INTERROGATORY NO. 15:

Are you claiming any physical, medical, psychiatric, psychological and/or emotional injuries as a result of the occurrence(s) alleged in the Complaint? If so, state:

- (a) The name and nature of any physical, medical, psychiatric, psychological and/or emotional injury claimed;
- (b) The name and address of each psychiatrist, physician, psychologist, therapist, counselor or other health care professional rendering treatment for such injury;
- (c) The date(s) of treatment for such injury;
- (d) Whether you had sought treatment for and/or been diagnosed with any physical, medical, psychiatric, psychological, or emotional condition(s) prior to December 3, 1992;
- (e) If (d) is in the affirmative, the date on which such treatment was sought and/or diagnosed, the nature of any such treatment and/or diagnosis, and the name and address of each psychiatrist, physician, psychologist, therapist, counselor, social worker, association or other health care professional rendering treatment for such conditions.

ANSWER: Yes.

- (a) The nature of the physical injury is being separated from society and having a complete loss of freedom by being locked up for more than 21 years for something I did not do. That is the physical deprivation or injury I suffered.

The nature of the psychological and emotional injury is being imprisoned from age 20 to age 42 for something I did not do and carrying the stigma of being convicted of two murders with which I had no involvement whatsoever. There is also psychological and emotional injuries from being in the prison, as well as psychological and emotional injuries caused by the trauma of being inserted into society from a prison environment and without living in the society in which I have been thrust for the past 21 years.

- (b) **None.**
- (c) **None.**
- (d) **None.**
- (e) N/A.

INTERROGATORY NO. 16:

Identify each and every doctor, psychologist, therapist, hospital, clinic, counselor, social worker, association, or other health care professional, medical facility, or entity at which or by whom Plaintiff was treated, counseled, diagnosed, examined or otherwise provided assistance for any medical, mental, psychological, emotional, or physical condition between November 1992 and the present, including the name, address, and telephone number of each such person or entity, and a description of the nature of the person's or entity's business or practice. In addition, for each such person or entity, state the date (and/or period of time) on or during which Plaintiff received such treatment, counseling, diagnosis, examination, or other assistance, and describe the nature of that treatment, counseling, diagnosis, examination, or other assistance.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Without waiving this objection, Plaintiff states: see Interrogatory # 15(b) above.

INTERROGATORY NO. 17:

Describe in detail and quantify and all damages/injuries for which you seek recovery in this suit. In so doing, provide any and all calculations thereof and provide any and all documents supporting such calculations pursuant to Fed. R. Civ. P. 34.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff objects to this interrogatory because it invades the attorney-client and work product privileges. Plaintiff objects to this interrogatory because the damages have yet to be calculated.

INTERROGATORY NO. 18:

Are you presently taking any drugs or prescriptions for a condition resulting from the incidents alleged in your Complaint. If so, please state the nature of such drug or prescription, and the full name and address of the doctor prescribing it.

ANSWER: No.

INTERROGATORY NO. 19:

Are you currently or have you ever received (or has anyone ever received on your behalf) any disability benefits for any physical, mental or emotional illness, or injury from any source, including but not limited to, a private employer, a private insurer, the Social Security Administration, or the Illinois Department of Public Aid etc? If so, list as to each benefit:

- (a) the name and address of the course of the benefit;
- (b) the nature of the disability involved; and
- (c) the period of time (month and year) during which the disability benefit was provided, and the nature and amount of the benefit.

ANSWER: No.

(a) N/A

(b) N/A

(c) N/A

INTERROGATORY NO. 20:

Describe in detail with specific references to time your movements and exact whereabouts between 8:00 a.m. on November 15, 1992 to 8:00 a.m. on November 17, 1992. In so doing, identify each and every person you spoke to or otherwise interacted with during such period of time (including persons with whom you were with at the time of your arrest), any addresses, businesses, or agencies at which you were present at any time during said period, the means or method by which you traveled during said period of time (vehicle, bus, elevated train, etc.), whether you were working during the above listed dates and times, including where and with whom you were working and what job you were performing for what pay, and your general activities during the above-listed time period.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff further objects to this interrogatory because it is overbroad in that it seeks information far in excess of what is admissible or relevant or likely to lead to admissible or relevant evidence. Without waiving these objections, Plaintiff states:

November 16, 1992, at approximately 11 a.m., I drove in my car from my cousin's apartment at 16th & Springfield to the North side. I parked near Kimberly Jefferson's apartment.

November 16, 1992 at approximately 12 p.m., I was with Marshall Payne in Kimberly Jefferson's apartment. I recall Payne and Jefferson being there, and Rodney Mathews may have been there; I do not recall. I believe that Kimberly's sister Serena might have been there also.

November 16, 1992 at approximately 2:00 or 2:30, Marshall Payne and I went to the McDonald's on Foster and Sheridan.

We did not see anyone we knew at McDonald's.

November 16, 1992, at approximately 3:00, we drove in my car to Cabrini Green to see some people we knew from school, but I do not recall who they were.

We left Cabrini Green in my car at about 5:45 or 6:00 and drove to and parked on Agatite. Marshall Payne and I then headed East on foot to Clarendon Park.

November 16, 1992 at approximately 6:30, we entered the Clarendon Park gym. Marshall Payne and I stood in the gym and watched people play basketball. We did not play basketball, as best as I can recall. We stayed in the gym for approximately 15 to 30 minutes. We learned from Rodney Mathews, who came into the gym, that Daniel Taylor had been arrested. I do not recall anyone else we interacted with in the gym.

November 16, 1992 at approximately 7:00, Marshall, Rodney, and I walked to Agatite and Hazel for just a few minutes. I spoke to Lewis Gardner and he gave me money near that corner. Marshall and I then went to Wilson and Sheridan, and I used a pay phone near the Burger King to call my son's mother to see if she was visiting her friend who lived across the street from the Burger King. She was not, and instead was still on the West Side.

As Marshall and I turned to go back towards Agatite, Rodney Mathews drove by with a person we called "light-skinned Germain" in Germain's car, and Marshall and I got in that car. We drove to someone's apartment to pick up Rodney Mathews' speakers. The apartment was near Winona and Winthrop.

Germain then drove the three of us to Audrey Mathews' apartment on Foster and Winthrop, and the three of us entered her apartment. This was about 7:45 or a little after. We watched Monday Night Football. While there, Rodney received a telephone call from Donna Crump, and Rodney suggested we all go to the Crumps. During the phone call, however, Donna Crump stated that something was going on in her neighborhood and she had seen police cars, and that we should not come right now.

November 16, 1992 at approximately 9:00 or 9:15, Marshall Payne and I started to walk back towards Agatite on Sheridan Road. At about Winona Street, we saw a guy named Jordan, whose last name I do not know, and he told us that some people had gotten shot, and he told us that he thought it was guys we hung with who got shot. About one block later, near Carmen Street, we saw Kimberly Jefferson on Sheridan, and I asked her to go tell Rodney Mathews to come down to Agatite. Marshall and I continued down Sheridan towards Agatite and Hazel, and when we got there, the people in front of the building told us that “two hypes” had gotten shot.

November 16, 1992, at some time shortly before 10:00 p.m., Marshall Payne and I walked to the Phillips’ apartment at 854 West Agatite. When we arrived at the Phillips’ apartment, we knocked on the door, which was answered by police officers, who snatched us into the apartment. They frisked both Marshall and me, and while I was being frisked, the officer felt my house arrest box. He immediately handcuffed me. I do not know the name of the officer. He asked me my name, and I responded, “Deon Patrick.” He then said to me, “Are these your drugs that we found?,” and when I said, “no,” he said, “Well, your mother said that they are yours,” and I said, “That’s impossible. My mother’s dead.” Two officers placed me in a room off to the side near the front of the apartment. At some point, officers brought Andrea Phillips into the room where I was, and she told one or more of the police officers in my presence that I am not her son.

From the room where I was, I could see Paul Phillips in the living room, which was also near the front. Marshall Payne was in the living room as well.

At some point, one of the police officers told me they were going to take me down to the station to determine if I was a fugitive. I heard one of the police officers tell Andrea

Phillips to turn on the news, and I heard one of the officers say that they wanted to see a report on corrupt cops from the West Side. Shortly thereafter, I could hear that report coming from the television, but I could not see the television. Shortly after the corruption we piece was over, the police officers moved me past the living room and out the front door of the apartment. In the living room I saw Andrea Phillips, Mark Tillis, Paul Philips, Marshall Payne, and “Fluff” and her kids. The police also removed Andrea Phillips and Mark Tillis, who were also in handcuffs, from the apartment.

After being led out of the apartment, I was led down the stairs and into a police car, where I waited for 5-10 minutes before we left. I was then taken to Addison and Halsted Police Station in squadcar. I was the only person in the car other than the officer or officers.

November 16, 1992, at approximately 10:30 or shortly thereafter, we arrived at Addison and Halsted. I was placed in a booking area with Mark Tillis and Andrea Phillips, with whom I spoke briefly. I was still handcuffed. I was then moved to another room alone, where I interacted with a female police officer. I do not know her name. She told me that an officer had spoken to my parole officer and that they were going to fax him information about the fact that I was found in a house where there was crack cocaine.

Shortly thereafter, they let me go, and I walked to the White Hen and I called Rodney Mathews, who conferenced in Akia Philips. I told Rodney to meet me downstairs at Audrey Mathews’ house with cab fare. When I arrived, I got cab fare from Rodney Mathews and spoke with Rodney.

I then walked to Sherena Jefferson’s house, and we both took a cab to the apartment where I was living on the West Side, 1637 South Springfield. We slept in that apartment until morning.

On November 17, 1992, I was awakened by my parole officer. He told me about his conversation with the police. He told me they had faxed him something showing that I had been picked up at a drug house. He took away all of my movement privileges, and said that if I leave the house, I am going back to the IDOC. I did not leave the house that day. My grandmother was in the room when I had this discussion with my parole officer.

INTERROGATORY NO. 21:

Describe in detail with specific references to time your movements and exact whereabouts between 8:00 a.m. on December 1, 1992 to 11:45 p.m. on December 2, 1992. In so doing, identify each and every person you spoke to or otherwise interacted with during such period of time (including persons with whom you were with at the time of your arrest), any addresses, businesses, or agencies at which you were present at any time during said period, the means or method by which you traveled during said period of time (vehicle, bus, elevated train, etc.), whether you were working during the above listed dates and times, including where and with whom you were working and what job you were performing for what pay, and your general activities during the above-listed time period.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff further objects to this interrogatory because it is overbroad in that it seeks information far in excess of what is admissible or relevant or likely to lead to admissible or relevant evidence. Without waiving these objections, Plaintiff states:

On December 2, at approximately 11:45 p.m., Officers O'Connor, Abreu, Killacky, and one or two more officers came to my cousin's apartment on Springfield and arrested me. My cousin Keona Scott and Marcus Franklin were present, along with other friends of Keona Scott that I did not know. The officers took me to Belmont and Western.

INTERROGATORY NO. 22:

Describe in detail your relationship with Dennis Mixon, Adrian Grimes, Michael Seymore, Lewis Gardner, Akia Phillips, Paul Phillips, Joseph Brown, Daniel Taylor, Lameul Hardy and Rodney Mathews on and before November 16, 1992, including the approximate date and circumstances under which you met the above named individuals, the amount of times and approximate dates you had contact with him and a general description of the nature of each such contact.

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. Plaintiff further objects to this interrogatory because it is overbroad in that it seeks information far in excess of what is admissible or relevant or likely to lead to admissible or relevant evidence. Without waiving these objections, Plaintiff states:

1. Describe in detail your relationship with Dennis Mixon on and before November 16, 1992: **None.**
 - (A) the approximate date and circumstances under which you met: **I don't remember meeting him.**
 - (B) the amount of times and approximate dates you had contact with him: **I saw him from a distance once or twice, but don't remember the dates or times.**
 - (C) a general description of the nature of each such contact. **N/A**
2. Describe in detail your relationship with Adrian Grimes on and before November 16, 1992: **None.**
 - (D) the approximate date and circumstances under which you met: **None.**
 - (E) the amount of times and approximate dates you had contact with him: **None.**
 - (F) a general description of the nature of each such contact. **None.**
3. Describe in detail your relationship with Michael Seymore on and before November 16, 1992: **I had known him for approximately two years; he was a Vice Lord, and I was a Vice Lord.**
 - (G) the approximate date and circumstances under which you met: **Don't recall.**

- (H) the amount of times and approximate dates you had contact with Seymore: **Don't recall.**
- (I) a general description of the nature of each such contact. **Used to see each other in the neighborhood.**
4. Describe in detail your relationship with Lewis Gardner on and before November 16, 1992: **I knew him about two to three months; he was a Vice Lord; I was a Vice Lord.**
- (J) the approximate date and circumstances under which you met: **Don't recall.**
- (K) the amount of times and approximate dates you had contact with him: **Probably saw him every day after meeting him; don't recall other details.**
- (L) a general description of the nature of each such contact. **Hanging out in the neighborhood.**
5. Describe in detail your relationship with Akia Phillips on and before November 16, 1992: **I knew him about two to three months; he was a Vice Lord; I was a Vice Lord.**
- (M) the approximate date and circumstances under which you met: **Don't recall.**
- (N) the amount of times and approximate dates you had contact with him: **Probably saw him every day after meeting him; don't recall other details.**
- (O) a general description of the nature of each such contact. **Hanging out in the neighborhood.**
6. Describe in detail your relationship with Paul Phillips on and before November 16, 1992: **I knew him about two to three months; he was a Vice Lord; I was a Vice Lord.**
- (P) the approximate date and circumstances under which you met: **Don't recall.**
- (Q) the amount of times and approximate dates you had contact with him: **Probably saw him every day after meeting him; don't recall other details.**
- (R) a general description of the nature of each such contact. **Hanging out in the neighborhood.**
7. Describe in detail your relationship with Joseph Brown on and before November 16, 1992: **I knew him about two to three months; he was a Vice Lord; I was a Vice Lord.**

- (S) the approximate date and circumstances under which you met: **Don't recall.**
- (T) the amount of times and approximate dates you had contact with him: **Probably saw him every day after meeting him; don't recall other details.**
- (U) a general description of the nature of each such contact: **Hanging out in the neighborhood.**

8. Describe in detail your relationship with Daniel Taylor on and before November 16, 1992: **I knew him about two to three months; he was a Vice Lord; I was a Vice Lord.**
- (V) the approximate date and circumstances under which you met: **Don't recall.**
- (W) the amount of times and approximate dates you had contact with him: **Probably saw him every day after meeting him; don't recall other details.**
- (X) a general description of the nature of each such contact: **Hanging out in the neighborhood.**
9. Describe in detail your relationship with Lameul [sic] Hardy on and before November 16, 1992: **None.**
- (Y) the approximate date and circumstances under which you met: **None.**
- (Z) the amount of times and approximate dates you had contact with him: **None.**
- (AA) a general description of the nature of each such contact. **None.**
10. Describe in detail your relationship with Rodney Mathews on and before November 16, 1992: **Been friends since approximately 1984 or 1985.**
- (BB) the approximate date and circumstances under which you met: **We met at Lincoln and Belmont at a basketball tournament. I don't recall the date.**
- (CC) the amount of times and approximate dates you had contact with him: **Approximately every day.**
- (DD) a general description of the nature of each such contact. **Close friend.**

INTERROGATORY NO. 23:

Did you have any contact or communication with any of the following individuals during your incarceration from 1992 to 2014: Daniel Taylor, Lewis Gardner, Rodney Mathews, Akia Phillips, Paul Phillips, Joseph Brown, Dennis Mixon, Lamuel Hardy, Adria Grimes, William Triplett (AKA Willie Lee Triplett), Dwayne Banford, and Christopher Robinson. If so, describe in detail the dates, number of times, nature of your contact, the contents of any conversations and identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013.

ANSWER:

1. Did you have any contact or communication with Daniel Taylor during your incarceration from 1992 to 2014: **Yes.**
 - A. the dates **Don't remember.**
 - B. number of times **Don't know.**
 - C. nature of your contact **When assigned to the same section of the same jail or prisons, we would see each other.**
 - D. the contents of any conversations **The content varied. It included conditions in prison, things with my family on the outside, our innocence, our efforts to get representation, and what steps our lawyers were taken when we got lawyers.**
 - E. identify by name the facility where you incarcerated when you had contact with Daniel Taylor during your incarceration from 1992 to 2013 [sic]. **Menard, County, Stateville, Pontiac.**

2. Did you have any contact or communication with Lewis Gardner during your incarceration from 1992 to 2014:
 - A. the dates **Don't remember**
 - B. number of times **Don't know.**
 - C. nature of your contact **I ran into him in Pontiac at an Islamic service. I believe this is the only time I saw him.**
 - D. the contents of any conversations **We had one brief conversation that one time. We talked about our innocence, but I don't remember the details of the conversation.**
 - E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **Pontiac.**

3. Did you have any contact or communication with Rodney Mathews during your incarceration from 1992 to 2014:
 - A. the dates **During times in 1993, 1994, and 1995, Mathews and I were cellmates at Cook County jail. After he was acquitted and went home, I used to call him on the phone. That lasted until approximately 1996 or 97. Then we lost contact. I got back in contact in around 1999. Then we lost contact. Then we spoke again briefly in approximately 2007. Since getting out, I have seen him a few times.**
 - B. number of times **Don't know.**
 - C. nature of your contact **Friends.**
 - D. the contents of any conversations **The content varied. It included conditions in prison, family, our innocence, our efforts to get representation, and what steps our lawyers were taken when we got lawyers, and his willingness to speak with my lawyers.**

- E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **Cook County, and then by phone, from Stateville and Pontiac.**
4. Did you have any contact or communication with Akia Phillips during your incarceration from 1992 to 2014: **He and I were cellmates in approximately 1992-1993 and perhaps into early 1994. Then he got out on a motion. From time to time, he and I would speak by phone.**
- A. the dates **Don't remember.**
 B. number of times **Don't know.**
 C. nature of your contact **Friends.**
 F. the contents of any conversations. **The content varied. It included conditions in prison, family, our innocence, our efforts to get representation, and what steps our lawyers were taken when we got lawyers.**
 D. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **Cook County, and then by phone, Stateville.**
5. Did you have any contact or communication with Paul Phillips during your incarceration from 1992 to 2014: **I would see Paul in Cook County, but we were never cellmates. The last time I saw him before getting out was in Cook County. Since getting out, I ran into him at the mall once.**
- A. the dates **Don't remember.**
 B. number of times **Don't know.**
 C. nature of your contact **Friends.**
 D. the contents of any conversations. **The content varied. It included conditions in prison, family, our innocence, our efforts to get representation, and what steps our lawyers were taken when we got lawyers.**
 E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **Cook County.**
6. Did you have any contact or communication with Joseph Brown during your incarceration from 1992 to 2014: **I would see Joseph in Cook County, but we were never cellmates. The last time I saw him was in Cook County.**
- A. the dates **Don't remember.**
 B. number of times **Don't know.**
 C. nature of your contact **Friends.**
 D. the contents of any conversations. **The content varied. It included conditions in prison, family, our innocence, our efforts to get representation, and what steps our lawyers were taken when we got lawyers.**

- E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **Cook County.**
7. Did you have any contact or communication with Dennis Mixon during your incarceration from 1992 to 2014: **From 1993 to 1995, we would have appearances in Court together, but did not talk. From 1998 to 2001, I would see Mixon in Stateville, but we didn't talk, or if we did, it was very brief, with very words, such as just hello. It was not until approximately 2003 that I spoke with Mixon about this case, and even then our conversations were strained, and then he left Stateville; I don't remember when. He appeared at Menard when I was at Menard, and I would see him passing, but we didn't talk. At some point I informed him that my lawyers wanted to speak with him, and he agreed to meet with them.**
- A. the dates **Don't remember.**
 B. number of times **Don't know.**
 C. nature of your contact **See above.**
 D. the contents of any conversations. **That he was willing to meet with my lawyers.**
 E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **Cook County, Stateville, Menard.**
8. Did you have any contact or communication with Lamuel Hardy during your incarceration from 1992 to 2014: **No.**
- A. the dates **N/A**
 B. number of times **N/A**
 C. nature of your contact **N/A**
 D. the contents of any conversations **N/A**
 E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **N/A**
9. Did you have any contact or communication with Adria [sic] Grimes during your incarceration from 1992 to 2014: **No.**
- A. the dates **N/A**
 B. number of times **N/A**
 C. nature of your contact **N/A**
 D. the contents of any conversations **N/A**
 E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **N/A**

10. Did you have any contact or communication with William Triplett (AKA Willie Lee Triplett) during your incarceration from 1992 to 2014: **No.**

- A. the dates **N/A**
- B. number of times **N/A**
- C. nature of your contact **N/A**
- D. the contents of any conversations **N/A**
- E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **N/A**

11. Did you have any contact or communication with Dwayne Banford during your incarceration from 1992 to 2014: **No.**

- A. the dates **N/A**
- B. number of times **N/A**
- C. nature of your contact **N/A**
- D. the contents of any conversations **N/A**
- E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **N/A**

12. Did you have any contact or communication with Christopher Robinson during your incarceration from 1992 to 2014: **Don't know anyone by that name.**

- A. the dates **N/A**
- B. number of times **N/A**
- C. nature of your contact **N/A**
- D. the contents of any conversations **N/A**
- E. identify by name the facility where you incarcerated when you had contact with any of the above named individuals during your incarceration from 1992 to 2013 [sic]. **N/A**

INTERROGATORY NO. 24:

Describe in detail what conversations, if any, you have had about:

- A. your whereabouts on November 16, 1992 at 8:43 p.m.,
- B. Daniel Taylor's arrest on November 16, 1992,
- C. your arrest on December 3 [sic], 1992, and
- D. the handwritten statement you provided on December 4, 1992, and

E. the facts alleged in your Complaint with any of the following individuals:

- 1 Dennis Mixon,
- 2 Adrian Grimes,
- 3 Lewis Gardner,
- 4 Akia Phillips,
5. Paul Phillips,
6. Joseph Brown,
7. Daniel Taylor,
8. Rodney Mathews or
9. any witness which you contend knowledge about the facts alleged in your Complaint,

including a description of everything said to you and everything said by you during such conversation(s), the date, time and place of any such conversation(s) and identify and witnesses that were present during such conversation(s).

ANSWER: Plaintiff objects to this interrogatory because it is not a single interrogatory within the meaning of Rule 33. It expects the Plaintiff to answer at least five distinct inquiries in relation to anywhere between 10 and 20 individuals, and to include “Everything said by Plaintiff” or “To plaintiff.” Ever. And to provide the date and time and place of each and every conversation they ever had. It is a ridiculous interrogatory and wildly overbroad. Note that since human conversation is never about only one thing, the demand that Plaintiff include everything said during a conversation that touched on one of the subjects (a) to (e) above makes it wholly objectionable on the ground that it is not limited to seeking admissible evidence or information leading to admissible evidence. Plaintiff further objects to this interrogatory because it invades the attorney-client and work product privileges. Without waiving these objections, Plaintiff states:

1. Describe in detail what conversations, if any, you have had about your whereabouts on November 16, 1992 at 8:43 p.m., with:

A. Dennis Mixon None.

- 1. Describe in detail a description of everything said to you during such**

conversation(s).

2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

B. Adrian Grimes None.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

C. Lewis Gardner None.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

D. Akia Phillips None.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

E. Paul Phillips None.

1. Describe in detail a description of everything said to you during such

conversation(s).

2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

F. Joseph Brown None.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

G. Daniel Taylor We have had some minimal conversation in which this was discussed, usually in the context of his having read my affidavit.

1. Describe in detail a description of everything said to you during such conversation(s). **Don't recall.**
2. Describe in detail a description of everything said by you during such conversation(s). **I told him I was at Audrey Mathews.**
3. Describe in detail the date of such conversations. **Don't remember**
4. Describe in detail the time of such conversations. **Don't remember.**
5. Describe in detail the place of such conversations. **Stateville**
6. Identify and [sic] witnesses that were present during such conversation(s). **Don't recall if anyone was.**

H. Rodney Mathews Many times.

1. Describe in detail a description of everything said to you during such conversation(s). **That we were at Audrey's at that time.**
2. Describe in detail a description of everything said by you during such conversation(s). **That we were at Audrey's at that time.**
3. Describe in detail the date of such conversations. **Don't recall.**
4. Describe in detail the time of such conversations. **Don't recall.**
5. Describe in detail the place of such conversations. **Cook County.**
6. Identify and [sic] witnesses that were present during such conversation(s). **No witnesses present.**

- I. any witness which you contend [sic] knowledge about the facts alleged in your Complaint. **None.**
1. Describe in detail a description of everything said to you during such conversation(s).
 2. Describe in detail a description of everything said by you during such conversation(s).
 3. Describe in detail the date of such conversations.
 4. Describe in detail the time of such conversations.
 5. Describe in detail the place of such conversations.
 6. Identify and [sic] witnesses that were present during such conversation(s).
2. Describe in detail what conversations, if any, you have had about Daniel Taylor's arrest on November 16, 1992, with:

J. Dennis Mixon **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

K. Adrian Grimes **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

L. Lewis Gardner **Yes. All in the County and all about the fact that Daniel Taylor was in lockup at the time of the murders.**

1. Describe in detail a description of everything said to you during such conversation(s). **Don't recall.**
2. Describe in detail a description of everything said by you during such conversation(s). **Don't recall.**
3. Describe in detail the date of such conversations. **Don't recall.**

4. Describe in detail the time of such conversations. **Don't recall.**
5. Describe in detail the place of such conversations. **Don't recall.**
6. Identify and [sic] witnesses that were present during such conversation(s).
From time to time these conversations occurred with more than one co-defendant present.

M. Akia Phillips **Yes. All in the County and all about the fact that Daniel Taylor was in lockup at the time of the murders.**

7. Describe in detail a description of everything said to you during such conversation(s). **Don't recall.**
8. Describe in detail a description of everything said by you during such conversation(s). **Don't recall.**
9. Describe in detail the date of such conversations. **Don't recall.**
10. Describe in detail the time of such conversations. **Don't recall.**
11. Describe in detail the place of such conversations. **Don't recall.**
12. Identify and [sic] witnesses that were present during such conversation(s).
From time to time these conversations occurred with more than one co-defendant present.

N. Paul Phillips **Yes. All in the County and all about the fact that Daniel Taylor was in lockup at the time of the murders.**

13. Describe in detail a description of everything said to you during such conversation(s). **Don't recall.**
14. Describe in detail a description of everything said by you during such conversation(s). **Don't recall.**
15. Describe in detail the date of such conversations. **Don't recall.**
16. Describe in detail the time of such conversations. **Don't recall.**
17. Describe in detail the place of such conversations. **Don't recall.**
18. Identify and [sic] witnesses that were present during such conversation(s).
From time to time these conversations occurred with more than one co-defendant present.

O. Joseph Brown **Yes. All in the County and all about the fact that Daniel Taylor was in lockup at the time of the murders.**

19. Describe in detail a description of everything said to you during such conversation(s). **Don't recall.**
20. Describe in detail a description of everything said by you during such conversation(s). **Don't recall.**
21. Describe in detail the date of such conversations. **Don't recall.**
22. Describe in detail the time of such conversations. **Don't recall.**
23. Describe in detail the place of such conversations. **Don't recall.**
24. Identify and [sic] witnesses that were present during such conversation(s).

From time to time these conversations occurred with more than one co-defendant present.

P. Daniel Taylor **Yes. All in the County and all about the fact that he was in lockup at the time of the murders.**

25. Describe in detail a description of everything said to you during such conversation(s). **Don't recall.**
26. Describe in detail a description of everything said by you during such conversation(s). **On more than one occasion I informed Daniel that getting a copy of his bond slip would help.**
27. Describe in detail the date of such conversations. **Don't recall.**
28. Describe in detail the time of such conversations. **Don't recall.**
29. Describe in detail the place of such conversations. **Don't recall.**
30. Identify and [sic] witnesses that were present during such conversation(s). **From time to time these conversations occurred with more than one co-defendant present.**

Q. Rodney Mathews **Yes. All in the County and all about the fact that Daniel Taylor was in lockup at the time of the murders.**

31. Describe in detail a description of everything said to you during such conversation(s). **Don't recall.**
32. Describe in detail a description of everything said by you during such conversation(s). **Don't recall.**
33. Describe in detail the date of such conversations. **Don't recall.**
34. Describe in detail the time of such conversations. **Don't recall.**
35. Describe in detail the place of such conversations. **Don't recall.**
36. Identify and [sic] witnesses that were present during such conversation(s). **From time to time these conversations occurred with more than one co-defendant present.**

R. any witness which you contend [sic] knowledge about the facts alleged in your Complaint. **John Theis**

1. Describe in detail a description of everything said to you during such conversation(s). **Objection, privileged.**
2. Describe in detail a description of everything said by you during such conversation(s). **Objection, privileged.**
3. Describe in detail the date of such conversations. **Objection, privileged, and without waiving objection, don't recall.**
4. Describe in detail the time of such conversations. **Objection, privileged, and without waiving objection, don't recall.**
5. Describe in detail the place of such conversations. **Objection, privileged, and without waiving objection, don't recall.**

6. Identify and [sic] witnesses that were present during such conversation(s).
I do not believe I had any conversations with Mr. Theis with anyone else present unless it was an attorney associated with him.
3. Describe in detail what conversations, if any, you have had about your whereabouts on November 16, 1992 at 8:43 p.m., with

S. Dennis Mixon: None.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

T. Adrian Grimes None.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

U. Lewis Gardner May have told him that I was at Audrey Mathews at that time, but I do not recall if I did or did not.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

V. Akia Phillips May have told him that I was at Audrey Mathews at that time, but I do not recall if I did or did not.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

W. Paul Phillips May have told him that I was at Audrey Mathews at that time, but I do not recall if I did or did not.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

X. Joseph Brown May have told him that I was at Audrey Mathews at that time, but I do not recall if I did or did not.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

Y. Daniel Taylor May have told him that I was at Audrey Mathews at that time, but I do not recall if I did or did not.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.

5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

Z. Rodney Mathews We discussed that we were at Audrey Mathews' together at the time of the murders.

1. Describe in detail a description of everything said to you during such conversation(s). **Do not recall the details of these conversations.**
2. Describe in detail a description of everything said by you during such conversation(s). **Do not recall the details of these conversations.**
3. Describe in detail the date of such conversations. **Don't recall.**
4. Describe in detail the time of such conversations. **Don't recall.**
5. Describe in detail the place of such conversations. **Don't recall.**
6. Identify and [sic] witnesses that were present during such conversation(s). **Don't recall.**

AA. any witness which you contend [sic] knowledge about the facts alleged in your Complaint. **No additional, other than John Theis. See Response to R. above in relation to conversations with John Theis.**

1. Describe in detail a description of everything said to you during such conversation(s). **See R Above.**
2. Describe in detail a description of everything said by you during such conversation(s). **See R Above.**
3. Describe in detail the date of such conversations. **See R Above.**
4. Describe in detail the time of such conversations. **See R Above.**
5. Describe in detail the place of such conversations. **See R Above.**
6. Identify and [sic] witnesses that were present during such conversation(s). **See R Above.**

4. Describe in detail what conversations, if any, you have had about your arrest on December 3, 1992.

BB. Dennis Mixon **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

7. Adrian Grimes **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

CC. Lewis Gardner **We discussed that we did not commit the murder, that our arrests were not valid, and that the confessions were coerced from us. I do not remember the details of these conversations and who was present for each conversation. They occurred only when we saw each other between our arrest and our indictment, during our joint trial, and occasionally while we both were in prison in Pontiac, IL.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

DD. Akia Phillips **We discussed that we did not commit the murder, that our arrests were not valid, and that the confessions were coerced from us. I do not remember the details of these conversations and who was present for each conversation. They occurred only when we saw each other between our arrest and our indictment, and while we both were held in the County lock-up.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

EE. Paul Phillips. **We discussed that we did not commit the murder, that our arrests were not valid, and that the confessions were coerced from us. I do not remember the details of these conversations and who was present for each conversation. They occurred only when we saw each other between our arrest and our indictment, and while we both were held in the County lock-up.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

FF. Joseph Brown. **We discussed that we did not commit the murder, that our arrests were not valid, and that the confessions were coerced from us. I do not remember the details of these conversations and who was present for each conversation. They occurred only when we saw each other between our arrest and our indictment, and while we both were held in the County lock-up.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

GG. Daniel Taylor **We discussed that we did not commit the murder, that our arrests were not valid, and that the confessions were coerced from us. I do not remember the details of these conversations and who was present for each conversation. They occurred when we saw each other between our arrest and our indictment, in the County lock-up and while we were both in prison at Pontiac, Stateville, and Menard.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.

5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

HH. Rodney Mathews We discussed that we did not commit the murder, that our arrests were not valid, and that the confessions were coerced from us. I do not remember the details of these conversations and who was present for each conversation. They occurred only when we saw each other between our arrest and our indictment, when we were in the County lock-up, and once Rodney Mathews was acquitted.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

II. any witness which you contend [sic] knowledge about the facts alleged in your Complaint. John Theis, See Response to R above.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

5. Describe in detail what conversations, if any, you have had about the handwritten statement you provided on December 4, 1992.

CCC. Dennis Mixon None.

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

DDD. Adrian Grimes **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

EEE. Lewis Gardner **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

FFF. Akia Phillips **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

GGG. Paul Phillips **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

HHH. Joseph Brown **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

III. Daniel Taylor **He told me his was beaten out of him.**

1. Describe in detail a description of everything said to you during such conversation(s). **Do not recall details of these conversations, although I believe he mentioned being hit with a flashlight.**
2. Describe in detail a description of everything said by you during such conversation(s). **Do not recall.**
3. Describe in detail the date of such conversations. **Do not recall.**
4. Describe in detail the time of such conversations. **Do not recall.**
5. Describe in detail the place of such conversations. **Do not recall.**
6. Identify and [sic] witnesses that were present during such conversation(s). **Do not recall.**

JJJ. Rodney Mathews **None.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

KKK. any witness which you contend [sic] knowledge about the facts alleged in your Complaint. **John Theis. See Response to R Above.**

1. Describe in detail a description of everything said to you during such conversation(s).
2. Describe in detail a description of everything said by you during such conversation(s).
3. Describe in detail the date of such conversations.
4. Describe in detail the time of such conversations.
5. Describe in detail the place of such conversations.
6. Identify and [sic] witnesses that were present during such conversation(s).

INTERROGATORY NO. 25:

Please state with specificity the name and address of the individuals and/or entities that provided any money and the source of the money to pay the \$10,000 reward announced by the Plaintiff and/or his attorney in 2002 and state the date, name and address of the individuals and/or entities that received any amount of the \$10,000 reward offered by the Plaintiff and/or his attorney in 2002 and the amount paid.

ANSWER:

Please state with specificity:

- A. the name of any individuals and/or entities that provided any money to pay the \$10,000 reward announced by the Plaintiff and/or his attorney in 2002: **Don't know.**
- B. the address of any individuals or entities that provided any money to pay the \$10,000 reward announced by the Plaintiff and/or his attorney in 2002: **Don't know.**
- C. the name of the source of any money to pay the \$10,000 reward announced by the Plaintiff and/or his attorney in 2002: **Don't know.**
- D. The address of the source of any money to pay the \$10,000 reward announced by the Plaintiff and/or his attorney in 2002 **Don't know.**
- E. the date that any individuals or entities received any amount of the \$10,000 reward offered by the Plaintiff and/or his attorney in 2002. **None to my knowledge.**
- F. the name of any individuals or entities received any amount of the \$10,000 reward offered by the Plaintiff and/or his attorney in 2002. **None to my knowledge.**
- G. the address of any individuals or entities received any amount of the \$10,000 reward offered by the Plaintiff and/or his attorney in 2002. **None to my knowledge.**
- H. the amount paid to any individuals or entities received any amount of the \$10,000 reward offered by the Plaintiff and/or his attorney in 2002. **None to my knowledge.**

Mr. Patrick reserves the right to modify and supplement all of these responses to the extent permitted by the Federal Rules of Civil Procedure and Evidence.

November 17, 2014

Respectfully submitted,
Deon Patrick, Plaintiff

/s/ Stuart J. Chanen

Stuart J. Chanen
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CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2014, a true and correct copy of Plaintiff Deon Patrick's Amended Responses to Defendant Anthony Villardita's First Set of Interrogatories was served by electronic and first-class mail to the following attorneys of record:

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/s/ Stuart J. Chanen
Stuart J. Chanen

VERIFICATION

I, Deon Patrick, pursuant to Federal Rule of Civil Procedure 33, hereby verify that the answers in the attached interrogatory responses are true and correct to the best of my knowledge and belief.

November 17, 2014



Deon Patrick