

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

AUG 20 2018

JAMES W. McDORMACK, CLERK
By: *Roche*
DEP. CLERK

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
_____ DIVISION

CASE NO. 4:18-cv-00541-JM-JTR

Jury Trial: Yes No
(Check One)

I. Parties

In item A below, place your full name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.

A. Name of plaintiff: DERRICK ALLEN
ADC # _____

Address: 3201 W. Roosevelt LR, AR 72204

Name of plaintiff: MARQUIS HUNT
ADC # _____

Address: 3201 W. Roosevelt LR, AR 72204

Name of plaintiff: RANDAL RANDOLPH
ADC # _____

Address: 3201 W. Roosevelt LR, AR 72204

"THIS IS A CLASS ACTION LAWSUIT SEE SHEET ATTACHED"

In item B below, place the full name of the defendant in the first blank, his official position in the second blank, his place of employment in the third blank, and his address in the fourth blank.

B. Name of defendant: Sheriff Doc Holladay

Position: Sheriff

Place of employment: Pulaski County Jail

Address: 3201 W. Roosevelt LR, AR 72204

Name of defendant: Sgt. BRAWLEY

Position: GRIEVANCE OFFICER

This case assigned to District Judge Moody
- 4 -
and to Magistrate Judge Ray

Place of employment: Pulaski Count Jail

Address: 3201 W. ROOSEVELT LR, AR 72204

Name of defendant: Major Briggs

Position: Sheriff

Place of employment: Pulaski County Jail

Address: 3201 W. ROOSEVELT LR, AR 72204

Name of defendant: Sgt. MusAddiq

Position: Sheriff

Place of employment: Pulaski County Jail

Address: 3201 W. ROOSEVELT LR, AR 72204

II. Are you suing the defendants in:

{ OTHER DEFENDANTS } OVER →
{ ON BACK OF PAGE }

- official capacity only
- personal capacity only
- both official and personal capacity

III. Previous lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes ___ No

B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

Parties to the previous lawsuit:

Plaintiffs: _____

Defendants: _____

NAME: LT. BANG

POSITION: Sheriff

Place of employment: Pulaski County Jail
3201 W. Roosevelt
LR, AR 72204

NAME: LT. Routh

POSITION: Sheriff

Place of employment: Pulaski County Jail
3201 W. Roosevelt
LR, AR 72204

- Court (if federal court, name the district; if state court, name the county):

- Docket Number: _____
- Name of judge to whom case was assigned: _____
- Disposition: (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____
- Approximate date of filing lawsuit: _____
- Approximate date of disposition: _____

IV. Place of present confinement: Pulaski County Jail
3201 W. ROOSEVELT LR, AR 72204

V. At the time of the alleged incident(s), were you:
 (check appropriate blank)

in jail and still awaiting trial on pending criminal charges

serving a sentence as a result of a judgment of conviction

in jail for other reasons (e.g., alleged probation violation, etc.)
 explain: _____

VI. The Prison Litigation Reform Act (PLRA), 42 U.S.C. § 1997e, requires complete exhaustion of administrative remedies of all claims asserted, prior to the filing of a lawsuit. There is a prisoner grievance procedure in the Arkansas Department of Correction, and in several county jails. Failure to complete the exhaustion process provided as to each of the claims asserted in this complaint may result in the dismissal without prejudice of all the claims raised in this complaint.

- A. Did you file a grievance or grievances presenting the facts set forth in this complaint?
 Yes No
- B. Did you completely exhaust the grievance(s) by appealing to all levels within the grievance procedure?

Yes No

If not, why? _____

VII. Statement of claim

State here (as briefly as possible) the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

While incarcerated in the Pulaski County Jail & housed in R-unit, the staff of the Pulaski County Jail continue to violate the civil rights of the inmates, but also the policy of the facility. On a daily basis, security is at risk, because a door, known as the LINK DOOR is opened for hours at a time. When the link door is opened, one deputy is left to watch both R & S units. While the policy states, as well as federal law that no more than 80 inmates per officer, this puts more than 150 inmates under the watch of one deputy at a time. Inmates have to remain on lock-down, because of the shortage of staff. This lock-down, prevents inmates from contacting their lawyers, bondsman, & family. Inmates have to give up cell clean-up, in order to come out their cells. Also, there is only one security camera in the unit. Which is only above the deputy station. Inmates safety is at risk due to blind spots in the unit. Eventhough, this cruel & unusual punishment & violation of due process.



We ARE in GENERAL Population but TREATED AS if WE ARE Ad. Seg. It is not the inmates fault for lack of staff.

When inmates try to seek help about this matter, they ARE threatened, maced, & placed in the hole. The Staff PROVOKES incidents. BECAUSE of the heavy workload, many staff member refuse to work our unit. Also, the SPEAKERS in the cells don't work so, WE CAN not get in touch with the unit deputy UNLESS WE BEAT on the door.

VIII. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

We seek 1.5 million dollars for All damages & civil rights violations.

I declare under penalty of perjury (18 U.S.C. § 1621) that the foregoing is true and correct.

Executed on this _____ day of _____, 20_____.

WINSTON DONAHUE

Jeremy Henderson

Darrell Thomas

VERNON Dodson

Quinal Braxton

ANTHONY HERVEY

Kaylon Bullard

Christopher Williams

FERRICK ALLEN

Janet Peters

Andre King

Signature(s) of plaintiff(s)

KANTAL RANDOLPH

Adrian Neal

ELLIOTH THOMAS

Margie Hunt 8875-17

Gary Williams

Thobias Quattara

Cedric Cooper Jr

CORNELL MERRITT

CEDRIC MOORE

THE FOLLOWING INMATES ARE PLAINTIFFS

- 1.) Marquis Hunt 8875-17 & HOUSED AT THE PULASKI COUNTY JAIL
- 2.) Randal Randolph
- 3.) DERRICK ALLEN
- 4.) Cedric Cooper JR
- 5.) CEDRIC MOORE
- 6.) Ibrahim Wattara
- 7.) Cornell Morris
- 8.) Jerome Henderson
- 9.) Andre King
10. Darrell Thomas #54741 ADC#135856 Birthday 12-3-1977
11. Winston Donahue #4792-18 ADC#111016
- 12.) Adrian Neal #S.O. 118698 Bookin#9623-18
- 13.) ELLIOTT THOMAS
- 14.) Derrek Peter #S.O 164695
- 15.) Terrence Hall #S.O 191407
- 16.) Corey William #S.O 206378 Bookin# 4957-17A
- 17.) VERNON DADSON
- 18.) Quincy Braxton
19. Jeremy Taylor SO# 203685 Bookin# 8079-18
- 20.) Devin Smith SO# 212361 Bookin#
21. Antwong Hervey # 5163-18
22. Kaylon Bullock SO# 202740
23. Christopher Williams 11291-18



Arkansas Democrat-Gazette/JOHN SYKES JR.

Pulaski County Sheriff Doc Holladay, shown in his office in Little Rock last week, will en

0.
AD
J
A st
qual
leas
mor
Lom
T
dam
hou:
er a
Bali,
sual
T
vey
at a
Shal
do n
one:
E
was
10 d
lays
Pur
mar
ter l
nun
info
coll
the
A
inju
taliz
Nug
T
out
Nor
trig
from
vok
wer
800
tain
I
pro
the
ond
thei
F
G



COUNT PULASKI



Arkansas Democrat-Gazette/JOHN SYKES JR.

Pulaski County Sheriff Doc Holladay says the memorial outside the sheriff's office in Little Rock is one of his best achievements in 12 years as sheriff.