



	2013, December 2013, and January 2014 by June 6, 2014, on a rolling basis.
3	Defendants must produce the specific disciplinary records requested for the first three months of 2014 by May 27, 2014.
4	Defendants are to produce a detainee population report reflecting the information already maintained for the detainees by the IMACS as of January 15, 2013, May 15, 2013, and April 15, 2014, by June 6, 2014.
5	Defendants are to produce the 30 most recent use of force incident reports prepared as of February 27, 2014, by May 27, 2014.
10	Defendants are to produce the requested documents for the identified 30 detainees by June 6, 2014, on a rolling basis.

**2. Plaintiffs’ Second Set of Requests for Production**

The motion is denied as to request # 2. The motion is granted in part as to the following:

<b>Request</b>	<b>Required Production and Deadline</b>
1	Defendants are to produce the videos requested for the 30 detainees from January 1, 2013, through April 30, 2014, by June 6, 2014, on a rolling basis.
3	Defendants are to produce the videos requested from December 1, 2013, through April 30, 2014, by June 6, 2014, on a rolling basis.

**3. First Set of Interrogatories**

The motion is denied as to Interrogatory 1 as moot because Defendants have agreed to provide the requested list by May 23, 2014.

**4. Expert Tour**

As for the touring of Divisions IX and X, the parties are to adhere to the following conditions:

1. Plaintiffs’ Expert Dr. Jeffery Schwartz and Defendants’ Expert Margo Fraiser will jointly conduct a tour of the Cook County Jail, with an emphasis on Divisions IX and X from May 28, 2014, until May 30, 2014;
2. By no later than May 22, 2014, each party shall produce and/or identify all facts, data, documents and other materials provided to that party’s expert in advance of the scheduled tour. If either party provides their expert with any additional facts, data, documents and materials after the

tour, that party must also contemporaneously produce and/or identify those materials to opposing counsel.

3. No attorneys involved in this litigation and/or employed by the Defendants will accompany the experts during the tour. Defendants may select the individual who will accompany the experts on their tour. This individual should have high-level knowledge of jail operations. Both experts are permitted to ask general operational questions of the individual leading the tour, which can be answered, if known. Plaintiffs' expert may be accompanied by a law student or non-attorney agent of Plaintiffs' counsel.

4. While the tour will focus primarily on Divisions IX and X, the experts shall be provided access to other areas of the jail that affect operations and security in those Divisions.

5. The experts will be permitted to conduct detainee interviews. Only the two experts and the detainee may be present for the interview and the interviews will occur in a confidential meeting area where Defendants' agents and/or staff cannot overhear the interview. Each expert will have the opportunity to identify detainees to interview. The expert who initiated the interview will be the first to interview the detainee. The observing expert will remain silent until the initiating expert concludes his or her questioning. Only then may the observing expert ask questions of the detainee. Neither expert may speak while the other expert has his or her turn questioning the detainee.

6. Defendants' expert shall not have meetings or phone calls with any of Defendants' agents or employees (with the exception of Defendants' attorneys who have appeared in this case). However, to the extent that Defendants' expert relies upon conversations with any agent or employee of Defendants, Defendants will make that person available for deposition. To the extent the agent or employee has already been deposed by Plaintiffs, Defendants will not be required to produce that agent or employee for another deposition without court order.

7. The tour will adhere to the following unless modified by mutual agreement of the experts:

May 28, 2014

8:00 a.m. - 10:30 a.m.: tour both Divisions

10:30 a.m. - 1:00 p.m.: tier observations (during these observations, experts will speak informally to detainees, observe staff/detainee interactions, and examine unit log books)

1:30 p.m. - 4:00 p.m.: tier observations  
4:00 p.m. - 6:00 p.m.: detainee interviews

The following tiers/units/officers/events will be visited for each Division:

- Punitive Segregation
- Protective custody
- Suicide watch
- Acute mental health
- Any step down units
- General Population
- Any special tiers (i.e. 40 and over)
- Administrative segregation
- Grievance Officer
- Classification
- Medical
- Meals
- Shift changes

8:00 p.m. - 10:00 p.m.: detainee interviews

May 29, 2014

8:00 a.m. - 12:30 p.m.: detainee interviews  
1:00 p.m. - 6:00 p.m.: tier observations  
9 p.m. - 1:00 a.m.: tier observations

May 30, 2014

8:00 a.m. - 12:00 p.m.: complete outstanding observations/interviews.

**B. May 2014 Depositions**

Based on the information provided by the parties in open court on May 19, 2014, the court orders that Defendants produce and Plaintiffs take: (a) two 30(b)(6) depositions on May 22, 2014, at 10:00 a.m. and at 1:00 p.m.; (b) two 30(b)(6) depositions on May 23, 2014, at 10:00 a.m. and at 1:00 p.m.; and (c) the deposition of Defendant Cara Smith on May 27, 2014, from 1:00 to 5:00 p.m.

Date: May 21, 2014

/s/ Young B. Kim