

IN THE UNITED STATES DISTRICT COURT FOR THE **FILED**  
EASTERN DISTRICT OF MISSOURI

NOV 19 1979

ROBERT E. BULLINGTON, et al )  
 )  
Plaintiffs )  
 )  
vs. )  
 )  
GENE MCNARY, et al )  
 )  
Defendants )

U. S. DISTRICT COURT  
E. DISTRICT OF MO.

Civil Action No. 79-650-C(4)

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS  
DIRECTED TO DEFENDANT

Comes now plaintiff, pursuant to Federal Rule of Civil Procedure 34, and hereby request that defendant produce the documents hereinafter described and permit plaintiff and their attorney to inspect them and copy such of them as they may desire. Plaintiff requests that the documents be made available for this inspection at the offices of counsel for plaintiff, Henderson, Heagney, & Thomas, 506 Olive St., Suite 605, St. Louis, Missouri, 63101, during normal business hours beginning at 10:00 A.M. on December 10, 1979 or at such other time and place as may be mutually agreed upon by counsel for the parties:

1. Blue prints of the St. Louis County Jail
2. Any Report or studies on air exchange or air ventilation of the St. Louis County Jail.
3. Any written procedures for requesting medical treatment or dental treatment.
4. Any written procedure concerning contact visits, regular visitation and making and receiving phone calls.
5. Any written procedures concerning jail discipline procedures.
6. Any written procedures for reducing time to be served by a sentenced inmate if he shows good behavior.
7. Any written procedures for the handling of inmates complaints.
8. Any reports or summaries concerning staff assignments, and days off or missed from employment.

Johnson v. O'Brien



JC-MO-010-026

9. Any written procedures for classifying of inmates.
10. Any written statements or guide lines concerning which reading material, such as magazines, books, and newspapers, the inmates may receive.
11. Any inventory of legal law books housed in the St. Louis County Jail.
12. Any listing or record pertaining to the names of the inmates housed at the St. Louis County Jail.
13. A"Manual of Standards for Adult Correctional Institutions".
14. The jail file of Mr. Robert Bullington.
15. All correspondence sent to Mr. Moreland from the inmates.
16. All correspondence sent to the inmates from Mr. Moreland.
17. Any reports of any United States Magistrate made relating to the St. Louis County Jail.
18. All written documents relating to grievance procedures of inmates.
19. Record of all inmate injuries and medical emergencies.
20. Recreation Log
21. Library log and record of all library requests.
22. Disciplinary reports on inmates.
23. Supervisors daily log.
24. Red zone shift log.
25. Blue zone shift log.
26. Daily staff assignment log.
27. Inmate rule book.
28. Jail operations manual.
29. Daily roster of inmates since 1979.
30. Record of all clothing and linen changes.
31. Jail evacuation plan for use in fire or other emergency.
32. Record of all inmate hair cutting.

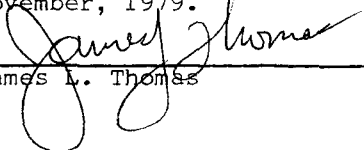
33. Record of visits by a mental health staff to inmates held in isolation because of mental or emotional problems since January 1, 1978.
34. Record of visits to the jail by the mental health staff since January 1, 1978.
35. Record of all visits to the jail by the medical doctor since January 1, 1978.

Henderson, Heagney & Thomas

by 

James L. Thomas #24986  
Attorneys for Plaintiffs  
506 Olive St., Suite 605  
St. Louis, MO 63101  
421-6544

A copy mailed to Donald J. Weyerich,  
Special Assistant County Counselor, attorney for defendants  
41 North Central, Clayton, MO 63105 this 16th day of  
November, 1979.

  
James L. Thomas