

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

LEAVE TO FILE

GRANTED *jm*

DENIED _____

LARRY GRAY, RONALD V. ARTIS,
and ALONZO PATTERSON,

Plaintiffs,

vs.

BILL FERRELL, Sheriff of Scott
County, Missouri, and LOUIS
HIRSCHOWITZ, ELDON ZIEGENHORN,
and DEWAINE SHAFFER, Judges of
the County Court of Scott
County, Missouri,

Defendants.

Case No. S81-0018C

FILED

JUL 17 1981

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

ANSWERS TO INTERROGATORIES

Comes now the defendant, Bill Ferrell, and for his
answers to Interrogatories propounded by plaintiffs states:

INTERROGATORY NO. 1: Please state how long defend-
ant Bill Ferrell has held the office of Sheriff of Scott
County, Missouri.

ANSWER: Since January 1, 1977.

INTERROGATORY NO. 2: Please state how many cells
the Scott County Jail in Benton, Missouri, contains.

ANSWER: Twelve cells and trustee cell.

INTERROGATORY NO. 3: Please state the dimensions
of each said cell, stating with particularity how many
square feet the floor of each said cell contains.

ANSWER: Each regular cell contains 90½ square
feet.

INTERROGATORY NO. 4: Please state how many
prisoners each cell is designed to accommodate.

ANSWER: Four.

INTERROGATORY NO. 5: Please state the average
number of prisoners detained in the Scott County Jail from
January 1, 1981, to April 1, 1981.

ANSWER: January, 1981: 40.5 daily
February, 1981: 44.6 daily
March, 1981: 39.9 daily

*D. Ans. to
Interrog.*

INTERROGATORY NO. 6: From January 1, 1981, to April 1, 1981, please state how regularly prisoners in the Scott County Jail were allowed to shower or bathe.

ANSWER: The normal jail rules would provide for prisoners to shower no less than three times each week, during winter months, and daily during warm weather. Records are not maintained as to exactly how often a particular prisoner showers or bathes.

INTERROGATORY NO. 7: From January 1, 1981, to April 1, 1981, please describe how regularly the prisoners were allowed to have their clothing and bedding laundered.

ANSWER: Once a week minimum; more often if the items are put out for washing.

INTERROGATORY NO. 8: When was the last time the mattresses were cleaned or changed?

ANSWER: Mattresses are aired once every two months. The mattresses are not cleaned; they are replaced when necessary.

INTERROGATORY NO. 9: Please state where the food served to the Scott County Jail prisoners was purchased, from January 1, 1981, to April 1, 1981.

ANSWER: Cauble & Field, Cape Girardeau, Missouri; Ford's Meat Company, Cape Girardeau, Missouri; and Bunny Bread Company, Sikeston, Missouri.

INTERROGATORY NO. 10: Please state the individual who was responsible for purchasing the food served to the Scott County Jail prisoners, from January 1, 1981, to April 1, 1981.

ANSWER: Jerry Eakins.

INTERROGATORY NO. 11: Please state how many meals per day were fed to prisoners in the Scott County Jail, from January 1, 1981, to April 1, 1981.

ANSWER: Three meals each day.

INTERROGATORY NO. 12: Please state as accurately as possible what each said meal consisted of.

ANSWER: See attached exhibit, menu of the Scott County Jail.

INTERROGATORY NO. 13: Please state in what type of storage facility in the Scott County Jail the food purchased and served to inmates, from January 1, 1981, to April 1, 1981, was stored.

ANSWER: Food is stored in a separate building located behind the Sheriff's Office, in the kitchen of the Scott County Jail, and in freezers located in both the kitchen and the separate building.

INTERROGATORY NO. 14: Please state the maximum period of time meat would be stored at the Scott County Jail before it would be served to the prisoners, during the first Quarter of 1981.

ANSWER: Not more than two weeks.

INTERROGATORY NO. 15: Please state the procedure of the Scott County Sheriff's Office regarding visitation of the prisoners by their friends or family, describing with particularity the length of time each prisoner is allowed to visit with any given guest and the facilities afforded for visitation.

ANSWER: The Scott County Jail rules provide the following with regard to visitation:

Visiting hours will be held from 6 to 7 P.M. on Tuesday, and 11 A.M. to 1 P.M. on Saturday, and will be held in the visiting room at the jail. Visits will be restricted to blood relatives of the prisoners, with no one under 18 admitted without a parent present. Prisoners will be allowed one visit, of sufficient duration to allow all prisoners an opportunity to see visitors, on each visiting day, unless prior arrangements are made with the Sheriff or jail personnel.

INTERROGATORY NO. 16: Please describe what procedure the Scott County Sheriff's Department follows to provide medical or dental services to prisoners who request immediate medical or dental attention.

ANSWER: When medical attention is needed the prisoner is transported to the emergency room at the Missouri Delta Community Hospital in Sikeston, Missouri; when dental attention is needed, the prisoner is transported to a dentist in either Chaffee or Scott City, Missouri.

INTERROGATORY NO. 17: Please state the procedure of the Scott County Sheriff's Office in regard to when the prisoners of the Scott County Jail are allowed into the fenced yard area attached to the Scott County Jail building.

ANSWER: Inmates are allowed out into the fenced area when the weather permits and sufficient personnel are available.

INTERROGATORY NO. 18: Please state the dimensions of the cell in the Scott County Jail known to the prisoners as the "hole".

ANSWER: The same size as all other cells.

INTERROGATORY NO. 19: If the plaintiff Larry Gray was confined to the "hole", while confined in the Scott County Jail, please state the reason or reasons for his confinement.

ANSWER: The so-called "hole" is no different than other cells other than being separated from the so called "bullpen" area. This cell is occasionally used on purposes of isolation if it is not otherwise being used in the regular housing of prisoners. The jail records do not reflect any particular reason why Larry Gray would have been in this cell other than normal and ordinary prisoner housing.

INTERROGATORY NO. 20: If the plaintiff Larry Gray was confined to the "hole", please state the length of time he was so confined.

ANSWER: Our records do not show whether and for what length of time Larry Gray may have been confined in this cell.

STATE OF MISSOURI)
) SS
COUNTY OF SCOTT)

AFFIDAVIT

Bill Ferrell, being first duly sworn, deposes and says that each of the aforesaid Answers is made without waiving any objection he may have with respect to the subject matter or subsequent use of these Answers or parts thereof, including all questions as to the competency, privilege, relevancy, materiality or admissibility thereof or any other proper objection thereto; the right to object any time on any ground to other Interrogatories or discovery procedures involving or related to the subject matter of the Interrogatories answered herein; and the right at any time upon proper showing to revise, correct or clarify any of said Answers.



Bill Ferrell

Subscribed and sworn to before me this 13th day
of July, 1981.


Notary Public

My Commission Expires: 12/2/83

BLANTON, RICE, SICKAL, GILMORE
AND SIDWELL

By: 
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ATTORNEY FOR DEFENDANT
BILL FERRELL

MENU

SUNDAY:

Breakfast: Rice, Coffee, Bread
Lunch: Cheese Sandwich, Roll
Dinner: Kraut/weiners, mashed potatoes, bread, vegetable,
Tea & Dessert

MONDAY:

Breakfast: 2 rolls, Coffee
Lunch: Bologna Sandwich, Roll
Dinner: Spaghetti & Meat Sauce, Dessert, Bread, Tea

TUESDAY:

Breakfast: Oats, Bread, Coffee
Lunch: Bologna Sandwich, Koolaid
Dinner: Beans/greens, Cornbread, Dessert, Tea

WEDNESDAY:

Breakfast: 2 rolls, Coffee
Lunch: Cheese Sandwich, Roll
Dinner: Vegetable Soup, Peanut-butter Sandwich, Jello,
Crackers & Tea

THURSDAY:

Breakfast: Rice, Bread, Coffee
Lunch: Bologna Sandwich, Roll
Dinner: Beans/greens, Cornbread, Dessert, Tea

FRIDAY:

Breakfast: 2 rolls, Coffee
Lunch: Cheese Sandwich, Roll
Dinner: Chili Mac, Peanut-butter Sandwich, Jello, Tea

SATURDAY:

Breakfast: Oats, Bread, Coffee
Lunch: Bologna Sandwich, Roll
Dinner: Hamburger Patty, 2 vegetables, Jello, Bread, Tea
(or Meat Loaf)

WFF/6/19/79

Gray v. Ferrell



JC-MO-013-003