

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE

DISTRICT OF ALABAMA, NORTHERN DIVISION

N. H. NEWMAN, AND OTHERS,)
)
Plaintiffs,)

JANICE PHILLIPS,)
)
Intervening)
Plaintiff,)

v.)

STATE OF ALABAMA; et al.,)
)
Defendants,)

UNITED STATES OF AMERICA,)
)
Amicus Curiae)

JERRY LEE PUGH, for himself)
and all others similarly situated,)
)
Plaintiffs,)

JANICE PHILLIPS,)
)
Intervening)
Plaintiff,)

v.)

JUDSON C. LOCKE, JR., individually)
and in his official capacity as Commis-)
sioner of the Alabama Board of Correc-)
tions; et al.,)
)
Defendants,)

IRA DE MENT, United States Attorney,)
)
Amicus Curiae.)

WORLEY JAMES; et al.,)
)
Plaintiffs,)

JANICE PHILLIPS,)
)
Intervening)
Plaintiff,)

v.)

GEORGE C. WALLACE, etc.; et al.,)
)
Defendants,)

THE NATIONAL PRISON PROJECT OF)
THE AMERICAN CIVIL LIBERTIES UNION)
FOUNDATION, INC.; and IRA DE MENT,)
United States Attorney,)
)
Amici Curiae.)

FILED
JUN 15 1977
JANE P. GORDON, CLERK
SECURITY CLERK

CIVIL ACTION NO. 3501-N

CIVIL ACTION NO. 74-57-N

CIVIL ACTION NO. 74-203-N

COMPLAINT IN INTERVENTION

Comes now your petitioner, Janice Phillips, who is over the age of twenty-one years, and respectfully shows unto the Court as follows:

1. I am confined in Tutwiler Prison, State of Alabama, in the custody of Judson C. Locke, Jr., Commissioner of the Alabama Board of Corrections.

2. I am suffering from a painful and swollen abdominal condition, and I am unable to control my bladder which adds to my discomfort. In the evening of June 2, 1977 I fainted and was admitted to the infirmary. The following morning, June 3, 1977, Dr. Winston Edwards told me that there was nothing wrong with me. Dr. Edwards first saw and examined me on May 16, 1977. On June 10, 1977 when I was again sent to Dr. Edwards for treatment he told me that it was my nerves and that in my species of animals that when a certain age was reached it caused the nerves to malfunction.

3. On June 1, 1977, Mrs. Kathleen Holt, the assistant warden at Tutwiler Prison examined my abdomen and saw that it was swollen and that it did not look right and reported my condition to the warden, Mrs. Doris Wood. Despite Mrs. Holt's and Mrs. Wood's recommendations that I needed to be seen and examined by a specialist both Dr. Edwards and Mr. Judson Locke continue to refuse to send me to another physician for examination, diagnosis and treatment.

4. I am ready, willing and able to pay a reasonable doctor's fee to a gyneecologist to receive examination, diagnosis and treatment.

The premises considered your petitioner prays that the Court will enter its order requiring Judson C. Locke to appear, instanto, and show cause, if any he has, why I should not be seen by a gyneecologist or other medical specialist and receive immediate and appropriate medical treatment.

And petitioner prays for such other further and different relief as
may seem just and proper.



JANICE PHILLIPS
Petitioner

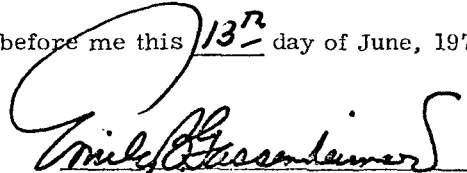
STATE OF ALABAMA)
)
ELMORE COUNTY)

Before me, the undersigned authority, personally appeared
JANICE PHILLIPS, who being by me first duly sworn deposes and
states under oath that she has read the foregoing Petition and has
signed the same after having been advised of the contents whereof.



JANICE PHILLIPS

Sworn to and subscribed before me this 13th day of June, 1977.



NOTARY PUBLIC

Pugh v. Sullivan



PC-AL-010-003