

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

JOSHUA DUNN, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO.
	)	2:14-CV-00601-MHT-TFM
JEFFERSON DUNN, in his official	)	
capacity as Commissioner	)	
of the Alabama Department of	)	
Corrections, et al.,	)	
	)	
Defendants.	)	
	)	

**JOINT STATUS REPORT REGARDING STATUS CONFERENCE**

The Parties, by and through undersigned counsel and pursuant to this Court’s Order (Doc. 527), respectfully submit this status report regarding matters they seek to discuss during the June 29, 2016 status conference.

**I. Mediation of the case**

The parties are actively working with Judge Ott to mediate the remaining claims in this matter. Through mediation, the parties are initially focused on addressing the claims related to the provision of mental health care.

**II. Structure of the case**

Plaintiffs are prepared to address the Court’s inquiry at the June 9, 2016 status conference regarding the structure of the presentation of evidence at trial.

### III. Outstanding discovery issues set for mediation

Plaintiffs have identified and continue to identify perceived gaps in the production of discovery by Defendants. Plaintiffs seek supplementation of discovery production, and the Parties have conferred on multiple occasions about the outstanding issues concerning credentialing documents, mortality reviews, and medical charts. The Parties are currently set for mediation of these discovery issues on June 29, 2016 at 10:30 a.m.

Dated: June 24, 2016

Respectfully Submitted,

/s/ Maria V. Morris

Maria V. Morris

Southern Poverty Law Center

400 Washington Avenue

Montgomery, AL 36104

*One of the Attorneys for the Plaintiffs*

Rhonda Brownstein (ASB-3193-O64R)

Maria V. Morris (ASB-2198-R64M)

Ebony G. Howard (ASB-7247-O76H)

Latasha L. McCrary (ASB-1935-L75M)

Brooke Menschel (ASB-7675-Z61K)

Jaqueline Aranda Osorno (ASB-3296-A17H)

SOUTHERN POVERTY LAW CENTER

400 Washington Avenue

Montgomery, AL 36104

Telephone: (334) 956-8200

Facsimile: (334) 956-8481

rhonda.brownstein@splcenter.org

maria.morris@splcenter.org

ebony.howard@splcenter.org

latasha.mccrary@splcenter.org  
brooke.menschel@splcenter.org  
jaqueline.aranda@splcenter.org

Miriam Haskell\* (FL. Bar No. 069033)  
SOUTHERN POVERTY LAW CENTER  
P.O. Box 370037  
Miami, FL 33137  
Telephone: (786) 347-2056  
Facsimile: (786) 237-2949  
miriam.haskell@splcenter.org  
*\*admitted pro hac vice*

Eunice Cho\* (GA. Bar No. 632669)  
SOUTHERN POVERTY LAW CENTER  
1989 College Avenue NE  
Atlanta, GA 30317  
Telephone: (404) 221-5842  
Facsimile: (404) 221-5857  
eunice.cho@splcenter.org  
*\*admitted pro hac vice*

William Van Der Pol, Jr. (ASB-2112-114F)  
J. Patrick Hackney (ASB-6971-H51J)  
Glenn N. Baxter (ASB-3825-A41G)  
Alabama Disabilities Advocacy Program  
Box 870395  
Tuscaloosa, AL 35487  
Telephone: (205) 348-4928  
Facsimile: (205) 348-3909  
wvanderpoljr@adap.ua.edu  
jphackney@adap.ua.edu  
gnbaxter@adap.ua.edu

Lisa Borden  
William Glassell Somerville, III (ASB-6185-E63W)  
Andrew Philip Walsh (ASB-3755-W77W)  
Patricia Clotfelter (ASB-0841-F43P)  
Baker Donelson Bearman Caldwell & Berkowitz PC  
420 20th Street North, Suite 1400

Birmingham, AL 35203  
Telephone: (205) 250-8375  
Facsimile: (205) 488-3775  
wsomerville@bakerdonelson.com  
awalsh@bakerdonelson.com  
dnabors@bakerdonelson.com  
pclotfelter@bakerdonelson.com

Gregory M. Zarzaur  
Anil A. Mujumdar (ASB-2004-L65M)  
Diandra S. Debrosse  
Zarzaur Mujumdar & Debrosse  
2332 2nd Avenue North  
Birmingham, AL 35203  
Telephone: (205) 983-7985  
Facsimile: (888) 505-0523  
gregory@zarzaur.com  
anil@zarzaur.com  
diandra@zarzaur.com

**ATTORNEYS FOR THE PLAINTIFFS**

*/s/ William R. Lunsford*

---

William R. Lunsford

*One of the Attorneys for Defendants  
Jefferson Dunn and Ruth Naglich*

William R. Lunsford  
Matthew B. Reeves  
Melissa K. Marler  
Stephen C. Rogers  
**MAYNARD COOPER & GALE PC**  
655 Gallatin Street  
Huntsville, AL 35801  
Telephone: (256) 512-5710  
Facsimile: (256) 512-0119  
E-mail: blunsford@maynardcooper.com  
mreeves@maynardcooper.com  
mmarler@maynardcooper.com  
srogers@maynardcooper.com

Mitesh B. Shah

Mitchell D. Greggs

Bryan A. Coleman

Evan P. Moltz

**MAYNARD COOPER & GALE PC**

1901 Sixth Avenue North

2400 Regions Harbert Plaza

Birmingham, AL 35203

Telephone: (205) 254-1178

Facsimile: (205) 714-6438

E-mail: [mshah@maynardcooper.com](mailto:mshah@maynardcooper.com)

[mgreggs@maynardcooper.com](mailto:mgreggs@maynardcooper.com)

[bcoleman@maynardcooper.com](mailto:bcoleman@maynardcooper.com)

[emoltz@maynardcooper.com](mailto:emoltz@maynardcooper.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 24<sup>th</sup> day of June, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following.

David R. Boyd, Esq.  
John G. Smith, Esq.  
Balch & Bingham LLP  
Post Office Box 78  
Montgomery, AL 36101

Anne Hill, Esq.  
Elizabeth Anne Sees, Esq.  
Joseph Gordon Stewart, Jr., Esq.  
Alabama Department of Corrections  
Legal Division  
301 South Ripley Street  
Montgomery, AL 36130

Michael Leon Edwards, Esq.  
Susan Nettles Han, Esq.  
John Eric Getty, Esq.  
Steven C. Corhern, Esq.  
Balch & Bingham LLP  
Post Office Box 306  
Birmingham, AL 35201

Deana Johnson, Esq.  
Brett T. Lane, Esq.  
MHM Services, Inc.  
1447 Peachtree Street, N.E., Suite 500  
Atlanta, GA 30309

/s/ Maria V. Morris  
One of the Attorneys for the Plaintiffs