



PC-IN-002-002

DUPLICATE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

ROGER W. ANDERSON, et al.,	:	
	:	
Plaintiffs,	:	
	:	CIVIL ACTION
v.	:	No. S83-0481
	:	
ROBERT ORR, et al.,	:	
	:	
Defendants.	:	

PLAINTIFFS' SUPPLEMENTAL SET OF INTERROGATORIES

The plaintiffs propound the following set of interrogatories for defendants' response. Each interrogatory is to be answered separately, fully, and under oath, within the time allotted by Rule 33 of the Federal Rules of Civil Procedure.

When addressing these interrogatories, the defendants are to exercise due diligence to secure the requested information and not merely respond on the basis of what they personally know at this time. The process of answering will require a search of past and present records and the securing of information in the possession of employees and other persons associated with defendants in their official capacities. If defendants cannot answer an interrogatory in full, after exercising due diligence to secure the information, they should state that fact and answer to the extent possible. When asked to furnish statistical data, if precise figures are not known or are not obtainable, defendants should indicate that fact and estimate the numbers involved and state the basis for the estimation (e.g. certain

individuals, specific documents, etc.) In the event more than one person responds to these interrogatories, separate affidavits should be furnished that specify the particular questions each defendant has responded to. When answering these interrogatories, the interrogatory should be restated with the answer immediately following. These interrogatories are of a continuing nature and, therefore, require supplemental answers as additional information and events accrue. The phrase "the past three years" is another way of saying "since January 1, 1985."

A. Questions Related to Medical Care

1. How many Westville inmates died at the prison, in transit to hospitals, or at hospitals during each of the past three years? Please identify each inmate by name and institutional number and specify the cause of each death.

2. How many Westville prisoners during the past three years have been diagnosed as having tuberculosis? Please identify each inmate by name and institutional number.

3. Have there been any epidemics at the prison during the past three years? If so, specify the nature of each epidemic and when it occurred.

4. Identify, by name and institutional number, every Westville inmate who has been confined in the prison hospital during the past three years. Please indicate by asterisks those inmates who are currently confined in the hospital.

5. Identify, by name and institutional number, all Westville inmates who have been identified during the past three years as having diabetes, hypertension, asthma, AIDS or cardiac disease and specify which disease each inmate had.

6. Identify, by name and institutional number, all Westville inmates who have been prescribed special medical diets during the past three years.

7. Identify, by name and institutional number, all Westville inmate who have been transferred within the past three years to an outside medical facility for evaluation or treatment. Please indicate by asterisks all Westville prisoners who are currently receiving medical treatment at outside hospitals or specialty clinics.

8. Identify by name, professional title and institutional position, all members of the prison's medical staff. Describe the functions and responsibilities of each member, indicate the work shift each routinely works, the number of days and hours each normally works, and specify whether he or she is an employee or a contract professional. When answering this question, please group the doctors, nurses and other professionals separately.

9. Identify, by name, every guard and orderly who has been assigned on a regular basis to the prison hospital during the past three years. Please indicate by asterisks the guards and orderlies who are currently assigned to the hospital and indicate the respective work shifts they are assigned to.

10. How many general medical beds (as distinguished from psychiatric beds) are there in the prison hospital?

11. Identify, by names and addresses, all outside hospitals and specialty clinics where Westville Correctional Center prisoners are sent for diagnosis or treatment and indicate the kinds of services that are ordinarily provided at each facility.

B. Questions Related to Mental Health Services

12. How many Westville inmates are currently receiving psychotropic medications at the prison? Please identify each inmate by name and institutional number and specify the type of medication each is receiving.

13. How many Westville inmates have a diagnosis associated with psychotic symptoms? Please identify each inmate by name and institutional number.

14. How many Westville inmates have been committed or transferred from the prison to a state mental hospital during each of the past three years due to psychiatric disorders? Please identify each inmate by name and institutional number.

15. How many Westville inmates have committed suicide at the prison during each of the past three years? Please identify each suicide victim by name and institutional number.

16. How many inmates have attempted suicide at the prison during each of the past three years? Please identify each inmate by name and institutional number.

17. Identify, by name and institutional number, each inmate who has been confined in the prison's psychiatric dormitories (Dorms 1, 3 and 5) during the past three years. Please indicate by asterisks those inmates who are currently confined in those units.

18. Identify (by name, professional title and institutional position) all members of the prison's psychiatric staff. Describe the functions and responsibilities of each member, indicate the work shift each routinely works, the number of days and hours each normally works, and whether the staff member is an employee or a contract professional.

19. Identify, by name, all guards and orderlies who have been assigned on a regular basis to the mental health wards of the prison hospital during the past three years. Please indicate by asterisks the guards and orderlies who are currently assigned to those wards and indicate the work shifts they are assigned to.

20. How many psychiatric beds are there in the prison?

C. Questions Related to Inmate Classification and Violence

21. How many inmate-on-inmate assaults* have occurred at the prison during each of the past three years?

22. How many inmate-on-inmate assaults during each of the past three years have

*The term "assault" refers to a physical attack by one inmate on another. It is distinguishable from a fight between two inmates.

- (a) involved the use of a "shank" or some other kind of implement or weapon;
- (b) involved or apparently involved rape, sodomy or some other form of sexual activity;
- (c) resulted in an inmate death;
- (d) led to an inmate's hospitalization, or
- (e) required out-patient medical treatment?

23. During each of the past three years, how many Westville inmates have been convicted in a disciplinary proceeding of

- (a) assaulting another inmate;
- (b) assaulting another inmate with a weapon;
- (c) sexually assaulting another inmate;
- (d) assaulting a guard or other member of the prison staff;
- (e) assaulting a guard or other member of the prison staff with a weapon;
- (f) robbing another inmate;
- (g) possessing a weapon at Westville;
- (h) extorting another inmate, or
- (i) selling, possessing or using drugs at Westville?

24. During each of the past three years, how many Westville inmates have been convicted in a criminal proceeding of

- (a) assaulting another inmate;
- (b) assaulting another inmate with a weapon;
- (c) sexually assaulting another inmate;
- (d) assaulting a guard or other member of the prison staff;

- (e) assaulting a guard or other member of the prison staff with a weapon;
- (f) robbing another inmate;
- (g) possessing a weapon at Westville;
- (h) extorting another inmate, or
- (i) selling, possessing or using drugs at Westville?

25. How many inmate fights (as opposed to assaults) have occurred at the prison during each of the past three years?

26. How many Westville prisoners have been placed in protective custody (whether by request or by involuntary assignment) during each of the past three years? Please identify each inmate by name and institutional number and indicate by asterisks those inmates who are currently in protective custody status.

27. What is the name and position of the person who determines whether a Westville inmate will be placed on protective custody status? If more than one person makes the determination or a committee makes such determinations, please identify all such persons or committees by name.

28. How many protective custody beds are located at Westville?

29. How many Westville prisoners have been placed in administrative segregation during each of the past three years because they were believed to pose a danger to other inmates? Please identify each inmate by name and institutional number.

D. Questions Related to Programming and Idleness

30. State the dimensions (in square feet) of the prison's general population exercise yards.

31. State the dimensions (in square feet) of the prison's gymnasium(s).

32. State the name and title of the person who is in charge of the prison's educational programming.

33. State the name and title of the person who is in charge of the prison's industries and vocational programming.

34. State the name and title of the person who is in charge of the prison's recreational programming.

35. Identify and describe generally the nature of all educational programs that are available at the prison.

36. Identify and describe generally the nature of all work or vocational programs that are available at the prison.

37. Identify and describe generally the nature of all organized recreational programs that are available at the prison.

38. Identify and describe generally the nature of all counseling programs that are available at the prison.


39. Identify, by name and position, all guards or other prison personnel who supervise organized inmate work details at the prison such as the cleaning and maintenance crews. When doing so, specify the work detail each supervises as well as the shift each routinely works in the institution.

40. How many inmates are employed in the prison's industries programs? Please specify the number of inmates who work in each shop.

41. How many inmates are employed in other work programs at the prison? Please identify each work program and specify the number of inmates who are employed in each program.

42. How many Westville prisoners are enrolled in educational programs? Please identify each educational program and specify the number of inmates who are enrolled in each program.

Respectfully submitted,



Jere Krakoff
Mark J. Lopez
National Prison Project of the
ACLU Foundation
1616 P Street, NW, Suite 340
Washington, DC 20036
(202) 331-0500

Lawrence G. Albrecht
Clinical Program Director
Valparaiso University
School of Law
Valparaiso, IN 46383

J. Patrick Smith
Smith & Smith Law Building
708 Jefferson Square
La Porte, IN 46350

Attorneys for Plaintiffs

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