

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

John Doe,

Plaintiff,

v.

No.

CORRECTIONAL OFFICER Smith, *et al*,

Defendants.

**PLAINTIFF'S INTERROGATORIES TO DEFENDANT**

Plaintiff requests that each defendant separately answer the following interrogatories under oath pursuant to Rule 33 of the Federal Rules of Civil Procedure:

**DEFINITIONS AND INSTRUCTIONS**

A. When asked to identify a person, state that person's full name, any nick names they may be known by, their current employment, their current address, and their position at the time at issue.

B. This request covers the time period of \_\_\_\_\_ through \_\_\_\_\_.

**INTERROGATORIES**

1. Describe the procedures established for counselors at \_\_\_\_\_ for processing grievances filed by prisoners. This request includes, but is not limited to, the procedures for entering information regarding grievances in CHAMPS or any other logging system, the procedures for obtaining input from third parties (*e.g.*, the Health Care Unit), and the procedures for preparing responses to grievances.

2. Describe the procedures established by the Grievance Officers at \_\_\_\_\_ Correctional Center for handling prisoner grievances, including without limitation any indexes, logs, databases, or other similar lists maintained, the filing system, and routing procedures.

3. Describe the procedures established by the Office of the Warden for handling grievances filed by prisoners, including without limitation any indexes, logs, databases, or other similar lists maintained, the filing system, and routing procedures.

4. Identify each person (if any) to whom the Warden delegated his authority to review findings by the Grievance Officer, and for each such delegation, describe the limitations or standards which governed that person's exercise of such delegated authority.

5. Describe the procedures for handling prisoner mail addressed to the Administrative Review Board at \_\_\_\_\_ Correctional Center.

6. Describe the procedures established by the Administrative Review Board for handling prisoner mail, including without limitation any indexes, logs, databases, or other similar lists maintained, the filing system, and routing procedures.

7. Describe the procedures established by the Director for handling grievances filed by prisoners, including without limitation any indexes, logs, databases, or other similar lists maintained, the filing system, and routing procedures.

8. Identify each person (if any) to whom the Director delegated his authority to review findings by the Administrative Review Board, and for each such delegation, describe the limitations or standards which governed that person's exercise of such delegated authority.

9. Describe any deviations from the procedures set forth in your answer to the previous interrogatories in connection with the handling of any grievances filed by the plaintiff in this case.

10. Identify each person who reviewed, answered, or otherwise had any involvement in handling, delivering, investigating, tracking, or responding to any grievance filed by plaintiff in this case.

11. Identify all steps taken by \_\_\_\_\_ in connection with his [her] investigation in this case, as described in the affidavit filed as Doc. \_\_\_\_\_.

12. Identify any expert witness you intend to call at the *Pavey* hearing in this case, and for each such expert state the subject of the expert's expected testimony, and whether a written report has been prepared or, if not, whether you anticipate preparation of such a report.

13. Identify any statements, information and/or documents known to you and requested by any of the foregoing interrogatories or by the document request served herewith which you claim to be work product or subject to any common law or statutory privilege, and with respect to each specify the legal basis for the claim.

Respectfully submitted,

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Attorney for plaintiff

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Uptown People's Law Center  
4413 North Sheridan  
Chicago, Illinois 60640  
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## CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he served a copy of the foregoing **Interrogatories** upon:

by depositing same in the United States Post Office box located at 4400 North Broadway, Chicago, Illinois, at or before 5:00pm on \_\_\_\_\_, with proper first class postage affixed.

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