

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 Request for Production of Documents**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, plaintiff, through his attorney, Alan Mills of the Uptown People's Law Center, requests that defendants produce for inspection and copying the originals of the following documents at the offices of defendant's counsel, within 30 days of service of this request.

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

**Documents To Be Produced**

1. All memoranda, interviews, or other similar documents relating to the investigation of [describe whatever incident is described in the complaint]. This request shall include all documents within your possession or control which were generated by any person or agency, including without limitation the Internal Affairs Division of the Illinois Department of Corrections, the Illinois State Police, and any other investigative agency.

2. All mail logs, requests for envelopes for legal mail, records of postage disbursements for legal mail, and any similar documents which would list or refer to outgoing mail from plaintiff to the Administrative Review Board.

3. All grievances from plaintiff received by the counselors at \_\_\_\_\_ Correctional Center and the responses, if any, to each grievance.

4. All grievances from plaintiff received by the Grievance Officers at \_\_\_\_\_ Correctional Center and the responses, if any, to each grievance.

5. All grievances from plaintiff received by the Warden at \_\_\_\_\_ Correctional Center and the responses, if any, to each grievance.

6. All grievances from plaintiff received by the Administrative Review Board and the responses, if any, to each grievance.

7. All grievances from plaintiff received by the Director and the responses, if any, to each grievance.

8. All grievances filed by plaintiff, and any responses to those grievances, not produced in response to the foregoing requests.

9. All documents which refer to or reflect the procedures for handling mail from prisoners at \_\_\_\_\_ Correctional Center addressed to the Administrative Review Board.

10. All documents which refer to or reflect the handling, filing, and indexing (including entry in any electronic database) of grievances and appeals by grievance officers at \_\_\_\_\_ Correctional Center. This request includes (but is not limited to) the procedures relating to entry of data into CHAMPS or any other log system.

11. All documents which refer to or reflect the handling, filing, and indexing (including entry in any electronic database) of grievances and appeals by the Grievance Officers at \_\_\_\_\_ Correctional Center.

12. All documents which refer to or reflect the handling, filing, and indexing (including entry in any electronic database) of grievances and appeals by the Office of the Warden at \_\_\_\_\_ Correctional Center. This request includes, but is not limited to, any delegation of authority by the Warden to determine grievances.

13. All documents which refer to or reflect the handling, filing, and indexing (including entry in any electronic database) of grievances and appeals by the Administrative Review Board.

14. All documents which refer to or reflect the handling, filing, and indexing (including entry in any electronic database) of grievances and appeals by the Director. This request includes, but is not limited to, any delegation of authority by the Director to determine grievances.

Respectfully submitted,

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Attorney for plaintiff

Alan Mills

Uptown People's Law Center

4413 North Sheridan

Chicago, Illinois 60640

(773) 769-1411

## CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he served a copy of the foregoing

**Interrogatories** upon:

Reona Daly

Assistant Attorney General

1001 East Main Street

Carbondale, Illinois 62901

Melinda Walter

Kelly R. Choate

Assistant Attorneys General

500 South Second Street

Springfield, Illinois 62706

by depositing same in the United States Post Office box located at 4400 North Broadway, Chicago, Illinois, at or before 5:00pm on May 24, 2003, with proper first class postage affixed.

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