

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

LOUIS HENDERSON, et al.,

Plaintiffs,

v.

**KIM THOMAS, Commissioner, Alabama
Department of Corrections, et al.,**

Defendants.

Civil Case No. 2:11cv224-MHT

**PLAINTIFFS' OBJECTIONS TO
DEFENDANTS' WITNESS AND EXHIBIT LIST**

Pursuant to the Court's September 5, 2012 Order (Doc. No. 198), Plaintiffs respectfully submit the following objections to Defendants' Witness and Exhibit List. As specified in the September 5 Order, Plaintiffs include objections only to Defendants' "will call" witnesses and "will use" exhibits. Plaintiffs reserve all objections to any witnesses on Defendants' "may call" witness list and to any exhibits designated as "may use" on Defendants' exhibit list.

Objections to Defendants' "will use" exhibits are attached hereto as Exhibit A. Plaintiffs reserve all objections to Defendants' "may use" exhibits.¹ Plaintiffs further reserve objections to any exhibits that Plaintiffs were unable to correctly identify due to errors in Defendants' exhibit descriptions and/or Bates numbers. To the extent Defendants plan to introduce any portion of any deposition at trial, Plaintiffs reserve all objections to those portions that may be offered.

Plaintiffs do not object to any witness on Defendants' "will call" witness list.

¹ This includes the collections or ranges of documents listed without Bates numbers (and in many cases identified only by generic categories such as "Any and all relevant documents produced by the State during the course of this litigation") in the paragraphs numbered 1 through 35 on pages 19 through 22 of the confidential document entitled "Defendants' Witness and Exhibit List."

RESPECTFULLY SUBMITTED:

/s/ Carl Takei

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September, 2012, I filed a true copy of the foregoing with the Court using the CM/ECF electronic filing system, which will automatically forward a copy to counsel for the Defendants:

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/s/ Carl Takei

CARL TAKEI

EXHIBIT A: PLAINTIFFS' OBJECTIONS TO DEFENDANTS' "WILL USE" EXHIBITS

Description	Bates No.	Objection
Memoranda from Limestone Clinical Psychologist re: Louis Henderson completion of institutional programs	ADOC000001-000004	FRE 801, 802, 803*
Certificates of Completion granted to Louis Henderson for completion of various programs within Limestone Correctional Facility	ADOC000005-000033	No objection
Louis Henderson Classification Summary	ADOC000046	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section and handwritten notations by staff
Signed certification by Louis Henderson of attending orientation at Limestone Correctional Facility	ADOC000326	FRE 401
Signed receipt/understanding by Louis Henderson of presence of HIV	ADOC000617	FRE 401
Louis Henderson Medication Administration Record (11/2001)	ADOC000936-000937	FRE 410, FRE 801, 802, 803*.
Certificates of Completion granted to Dana Harley for completion of various programs	ADOC001091-001380	No objection as to 1091-1115; All objections reserved as to the subsequent pages that do not match the description given.
Dana Harley Inmate Refusal to Participate in Drug Treatment Form (8-6-10)	ADOC001116	FRE 401
Dana Harley Classification Summary (8-30-10)	ADOC001206, 001208	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805 as to each "Comments" section and "Justification and Comments" section
Dana Harley 24 Hour Advance Notification of Pending Reclassification (8-25-10)	ADOC001209	FRE 801, 802, 803* unless it is introduced solely to establish that Ms. Harley received and signed this document. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805 as to each "Comments" section and "Justification and Comments" section
Dana Harley Inmate Classification Security Level (8-2009)	ADOC001235	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to each "Comments" section and "Justification and Comments" section
Dana Harley Classification Summary (4-13-10)	ADOC001261	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section and handwritten notations except signatures.
Dana Harley Classification Summary (6-15-11)	ADOC001262	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section.
Dana Harley Custody Classification (2009)	ADOC001263	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section and handwritten notations except signatures.
Dana Harley Custody Classification (7-27-09)	ADOC001264	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section.
Letter from ADOC Classification Division to District Attorney Geneva regarding Dana Harley community-based program	ADOC001299	FRE 401, FRE 801, 802, 803*
Dana Harley Inmate Request Slip (4-14-11)	ADOC001305	FRE 401
Dana Harley Inmate Request Slip (4-5-11)	ADOC001306	FRE 401
Dana Harley Inmate Request Slip (4-21-11)	ADOC001312	FRE 401. Additionally, FRE 801, 802, 803 as to response by "MSJ"

Description	Bates No.	Objection
Dana Harley Inmate Request Slip (4-11-11)	ADOC001313	FRE 401. Additionally, FRE 801, 802, 803 as to response by "MSJ"
Dana Harley Inmate Request Slip (3-21-11)	ADOC001314	FRE 401. Additionally, FRE 801, 802, 803 as to response by "MSJ"
Dana Harley Inmate Request Slip (12-28-10)	ADOC001317	FRE 401.
Dana Harley Inmate Request Slip (9-26-10)	ADOC001321	FRE 801, 802, 803*. FRE 901
Dana Harley Inmate Request Slip (12-19-10)	ADOC001326	FRE 401. Additionally, FRE 801, 802, 803, 805 as to response by (illegible)
Dana Harley Inmate Request Slip (11-2000)	ADOC001328	FRE 401. Additionally, FRE 801, 802, 803 as to response by "Kjon"
Dana Harley Inmate Request Slip (12-3-10)	ADOC001329	FRE 401. Additionally, FRE 801, 802, 803 as to response and comment by Karla Jones and "KJ"
Dana Harley Inmate Request Slip (12-16-08)	ADOC001331-001332	FRE 401. Additionally, FRE 801, 802, 803 as to response by "VMcQueen"
Dana Harley Inmate Request Slip (12-16-08) with note from Lt. Mills	ADOC001334	FRE 401. Additionally, FRE 801, 802, 803 as to response by (illegible)
Dana Harley Letter to Warden Jones regarding protective custody	ADOC001338	FRE 401
Dana Harley Letter to Warden Albright regarding lock-up/protective custody	ADOC001340	FRE 401, 403
Dana Harley Inmate Request Slip (8-7-08)	ADOC001360	FRE 401, 403, 404(a)(1) and (b)(1), 608(b). Additionally, 801, 802, 803 as to response by (illegible).
Dana Harley Inmate Request Slip (11-2000)	ADOC001366	FRE 401. Additionally, FRE 801, 802, 803 as to response by Ms V(aughn?)
Dana Harley Inmate Request Slip (11-5-07)	ADOC001367	FRE 401. Additionally, FRE 801, 802, 803 as to response by Ms V(aughn?)
Letter from Dana Harley to Dr. Chambers regarding student aide at J.F. Ingram Technical College(9-5-07)	ADOC001369	FRE 401
Dana Harley Inmate Request Slip (4-9-07)	ADOC001372	FRE 401. Additionally, FRE 801, 802, 803 as to response by Ms. V(aughn?)
Dana Harley Inmate Request Slip (4-9-07)	ADOC001374-001375	FRE 801, 802, 803 as to responses by Ms. V(aughn?) and (illegible)
Dana Harley Inmate Request Slip (9-9-04)	ADOC001378	FRE 401. Additionally,, FRE 801, 802, 803, 404(a)(1), 404(b)(1), 608(b) as to response by (illegible)
Dana Harley Inmate Request Slip (11-2003)	ADOC001381	FRE 401. Additionally, FRE 801, 802, 803 as to unsigned notations by staff.
Letter from Dana Harley to Ms. Deese regarding custody review (11-21-02)	ADOC001382	FRE 401, 403, 404(a)(1) and (b)(1), 608(b).
Dana Harley Peace Agreement (9-10-00)	ADOC001433	FRE 401, 403, 404(b)(1), 608(b)

Description	Bates No.	Objection
Dana Harley acknowledgment regarding community based placement (2-8-10)	ADOC001521	FRE 106, 401
Dana Harley Peace Agreement (3-14-04)	ADOC001569	FRE 401, 403, 404(b)(1), 608(b). Additionally, FRE 801, 802, 803, 805 as to handwritten "summary" section.
Dana Harley Disciplinary Report (10-31-05 incident)	ADOC00171-001712	FRE 106, 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Dana Harley Disciplinary Report (1-28-04 incident)	ADOC001737-001740	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Dana Harley Disciplinary Report (1-28-04 incident)	ADOC001741-001743	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Dana Harley Disciplinary Report (10-6-02 incident)	ADOC001770-001771	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Dana Harley Disciplinary Report (10-5-02 incident)	ADOC001781-001783	FRE 106, 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Dana Harley Disciplinary Report (7-20-02 incident)	ADOC001793-001795	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Dana Harley Classification on Appeal Form (6-23-11)	ADOC001893	FRE 401, FRE 801, 802, 803, 805 as to handwritten "Comments of Warden/Classification Personnel"
Dana Harley Classification Summary (6-2011)	ADOC001894	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to each "Comments" section and "Justification and Comments" section
Dana Harley Classification Appeal Form (12-29-09)	ADOC001895	FRE 401. Additionally, FRE 801, 802, 803, 805 as to handwritten "Comments of Warden/Classification Personnel"
Dana Harley Intra-System Transfer/Receiving Screening (9-21-11))	ADOC002695	FRE 401, FRE 801, 802, 803*
Dana Harley Intra-System Transfer/Receiving Screening (8-21-10)	ADOC002727	FRE 401, FRE 801, 802, 803*
Dana Harley Medication Administration Record (12-2011)	ADOC002979-002980	FRE 106, 401, 801, 802, 803*
Memorandum from Limestone Clinical Psychologist/Psychological Associate regarding Darrell Robinson Mental Health Workshops and Other Instructional Programs (2009)	ADOC003156	FRE 401, FRE 801, 802, 803*
Memorandum from Limestone Clinical Psychologist/Psychological Associate regarding Darrell Robinson Mental Health Workshops and Other Institutional Programs (2005)	ADOC003157	FRE 401, FRE 801, 802, 803*
Darrell Robinson Supervised Re-Entry Program Application (10-27-11)	ADOC003186-003189	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to each "Comments" section
Darrell Robinson Classification Summary (2010)	ADOC003192	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section and additional handwritten and typewritten notations except signatures.
Darrell Robinson Health Screening and Criteria Assessment Tool DWR (7-29-11)	ADOC003226-003227	No objection
Darrell Robinson Health Screening and Criteria Assessment Tool DWR (12-7-09)	ADOC003229-003230	No objection
Inmate Darrell Robinson Awareness Acknowledgement (5-7-09)	ADOC003238-003238	FRE 401

Description	Bates No.	Objection
Darrell Robinson Major Institutions -Behavior Citation (2-20-06)	ADOC003263	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Darrell Robinson Incident Report (2-15-06)	ADOC003264-003265	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Darrell Robinson HIV Intake Questionnaire (5-7-09)	ADOC003361	FRE 401, 801, 802, 803*
Darrell Robinson Medication Administration Record (11-2011)	ADOC003444	FRE 801, 802, 803*. Additionally, FRE 401 as to everything except the notation "HIV+"
Darrell Robinson Keep On Person-Self Medication Program Patient and Provider Contract (6-2-09)	ADOC003479	FRE 401
Dwight Smith List of Completed/Participated Programs	ADOC003538	FRE 801, 802, 803*, 901
Memoranda from Limestone Clinical Psychologist re: Dwight Smith completion of mental health workshops and other institutional programs	ADOC003539-003541	FRE 801, 802, 803*
Dwight Smith Custody Classification (8-17-09)	ADOC003565	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section.
Dwight Smith Letter to Ms. Bias regarding Work Release (6-2011)	ADOC003599	FRE 404(a)(1) and (b)(1), 608. FRE 801, 802, 803 as to response by Ms. Bias
Jefferson County Department of Health Male Sexually Transmitted Disease Record for Dwight Smith (12/23/99)	ADOC003672	FRE 401, 403, 801, 802, 803*, 901
Dwight Smith Decatur Community Based Facility/Community Work Center acknowledgement of rules and policies in Inmate Orientation Booklet	ADOC003689	FRE 106, 401
Dwight Smith Orientation Form (5-30-06)	ADOC003698	FRE 401
Dwight Smith Classification Appeal Form (6-15-11)	ADOC003771	FRE 106, 401, 404(a)(1) and (b)(1), 608(b). Additionally, 801, 802, 803, 805 as to "Comments of Warden/Classification Personnel"
Dwight Smith HIV Intake Questionnaire (5-26-06)	ADOC003792	FRE 401, 801, 802, 803*
Albert Knox Pre Release and Re-Entry Services Inmate Community Re-Entry Checklists	ADOC004116-004224	FRE 401, 801, 802, 803* as to ADOC004116; All objections reserved as to the subsequent pages that do not match the description given.
Albert Knox Personal Data Report for Transferred Inmate (10-24-11)	ADOC004117-004149	FRE 401, 404(a)(1) and (b)(1), 608(b), 801, 802, 803* as to ADOC004117-4118; All objections reserved as to the subsequent pages that do not match the description given.
Alabama Board of Pardons and Paroles Report of Investigation -Albert Knox Jr.	ADOC004173-004172	FRE 106, 401, 403, 404(a)(1) and b(1), 608(b), 609, 801, 802, 803, 805 as to the Probation and Parole Investigation. All objections reserved as to ADOC004172, which is an unrelated document.
Albert Knox letter to Ms. Harris regarding Work Release	ADOC004198	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 901 as to handwritten, unsigned response.
Albert Knox Peace Agreement (5-20-10)	ADOC004233	FRE 401, 403, 404(b)(1), 608(b), 801, 802, 803, 805.
Albert Knox Disciplinary Report (1-22-10)	ADOC004256-004259	No objection
Albert Knox Incident Report (6/10/09)	ADOC004265	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805

Description	Bates No.	Objection
Albert Knox Inmate Classification Security Level	ADOC004355-004323	FRE 106, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to each "Comments" section on ADOC004355; All objections reserved as to other numbers apparently identified that are out of sequence with this page. These out of sequence pages do not match the description given.
Albert Knox Health Record -Master Problem List (4-18-09 to 7-2-11)	ADOC004369	FRE 401, 801, 802, 803*
Albert Knox Escape Sheet LCF	ADOC004370	FRE 401, 609, 801, 802, 803*
Albert Knox Release of Responsibility (10-11-11)	ADOC004378	FRE 401
Albert Knox Release of Responsibility (7-2011)	ADOC004384	FRE 401
Albert Knox Release of Responsibility (1-5-10)	ADOC004387	FRE 401
Albert Knox Consent Form For Flu Vaccine (10-10-09)	ADOC004388	FRE 401
Albert Knox HIV Intake Questionnaire (5-20-09)	ADOC004391	FRE 801, 802, 803*
Albert Knox Prison Medical History and Screening (4-16-09)	ADOC004398	FRE 401, 801, 802, 803*
Albert Knox Health Screening and Criteria Assessment Tool DWR (7-29-2011)	ADOC004402	FRE 106, 801, 802, 803*
Albert Knox Segregation Record Review and Visit Log (2010)	ADOC004404	FRE 401, 403, 801, 802, 803*
Albert Knox Refusal to Submit To Treatment (11-30-09)	ADOC004405	FRE 401
Albert Knox Release of Responsibility (11-30-09)	ADOC004406	FRE 401, 801, 802, 803, 805
Albert Knox Health Screening and Criteria Assessment Tool DWR (10-27-09)	ADOC004407	FRE 106, 801, 802, 803*
Albert Knox Segregation Record Review and Visit Log (2009)	ADOC004410	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803
Albert Knox Special Unit Inmate Release (10-21-11)	ADOC004412	FRE 401
Albert Knox Health Services Request Form (5-20-11)	ADOC004446	FRE 401. Additionally, FRE 801, 802, 803 as to handwritten notations by staff.
Albert Knox Health Services Request Form (5-24-10)	ADOC004464	FRE 401. Additionally, FRE 801, 802, 803 as to handwritten notations by staff.
Albert Knox Inter Disciplinary Progress Notes (4-24-09)	ADOC004488	FRE 801, 802, 803
Albert Knox Health Services Request Forms	ADOC004491-004457	FRE 401, 801, 802, 803 as to ADOC004491; All objections reserved as to other numbers apparently identified that are out of sequence with this page. These out of sequence pages do not match the description given.
Albert Knox Chronic Disease Clinic Follow-Ups	ADOC004503-004495	Assuming that the out of sequence numbers were intended to read ADOC004495-4503: FRE 401, 801, 802, 803. To the extent that something different was intended with this out of sequence numbering, all objections are reserved.

Description	Bates No.	Objection
Albert Knox Medication Administration Record (8-2011)	ADOC004617	FRE 401, 801, 802, 803*
James Anthony Douglas Escape Report (6-5-02)	ADOC004817	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
James Douglas Health Screening and Criteria Assessment Tool (1-5-11)	ADOC004861	FRE 106, 801, 802, 803
James Douglas Orientation Form (10-12-05)	ADOC004897	FRE 401
James Douglas Disciplinary Report (6-1-02 incident)	ADOC004940-004941	FRE 401, 403, 404(a)(1) and b(1), 608(b), 801, 802, 803, 805
James Douglas Classification Appeal Form (8-26-11)	ADOC005013	FRE 106, 401. Additionally, FRE 801, 802, 803, 805 as typewritten and handwritten notations by staff.
James Douglas Medication Administration Record (11-2011)	ADOC005477	FRE 401, 801, 802, 803*
Alqadeer Hamlet Classification Summary (1-26-11)	ADOC005621	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805 as to "Justification and Comments" section
Alqadeer Hamlet Custody Classification (1-13-10)	ADOC005622	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805 as to "Justification and Comments" section
Alqadeer Hamlet Letter to Mr. Sumner regarding custody classification	ADOC005651	FRE 401. Additionally, 801, 802, 803 as to handwritten responses by staff.
Alqadeer Hamlet HIV Intake Questionnaire (12-1-08)	ADOC005803	FRE 401, 801, 802, 803*
Alqadeer Hamlet Chronic Disease Clinic Follow-Up (8-16-10)	ADOC005822	FRE 401, 801, 802, 803*
Alqadeer Hamlet Physician's Orders (2009)	ADOC005845	FRE 401, 801, 802, 803, 805
Alqadeer Hamlet Intra-System Transfer/Receiving Screening (3-25-11)	ADOC005855	FRE 401, 801, 802, 803, 805
Alqadeer Hamlet Medication Administration Record (11-2011)	ADOC005870	FRE 401, 801, 802, 803*
Alqadeer Hamlet Refusal of Treatment Form (3-19-09)	ADOC005903	FRE 401, 403, 801, 802, 803, 805
Jeffery Beyer Classification Summary (1-26-11)	ADOC005964	FRE 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805 as to "Justification and Comments" section and handwritten notations by staff.
Jeffery Beyer Bureau of Field Services Case Report (11-5-82)	ADOC005970	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805, 901
Jeffery Beyer Letter to Mr. Sumner regarding Requesting Classification Appeal Form (9-26-11)	ADOC005985	FRE 106, 401
Jeffery Beyer Health Screening and Criteria Assessment Tool DWR (9-8-11)	ADOC006003	FRE 106 (complete document is Joint Exhibit J-28)
Jeffery Beyer Health Screening and Criteria Assessment Tool DWR (12-7-10)	ADOC006005-006006	No objection

Description	Bates No.	Objection
Jeffery Beyer HIV Intake Questionnaire (5-28-10)	ADOC006090	FRE 401, 801, 802, 803*
Jeffery Beyer Intra-System Transfer/Receiving Screening (7-8-10)	ADOC006127	FRE 401, 403, 801, 802, 803*
Jeffery Beyer Medication Administration Record (11-2011)	ADOC006183	FRE 401, 801, 802, 803*
Jeffery Beyer Medication Non Adherence (7-20-10)	ADOC006203	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803*
Inmate Handbook (6/9/2003) (Comm Campbell)	ADOC008607-008661	FRE 401
ADOC Classification Manual (2010)	ADOC008663-008782	No objection
Code Map	ADOC008783-008786	No objection
E-4 Inmate Periodic Health Assessment (2010)	ADOC008790-008801	No objection
ADOC Classification Department Requested Pre-Transfer Health Screening Review/Health Service Screening Guideline/Female Inmate	ADOC008802-008802	No objection
Female Inmate With HIV + Serology/Health Screening and Criteria Assessment Tool Specific to Montgomery Work Release Program	ADOC008809-008810	No objection
Male Inmate With HIV + Serology/Health Screening and Criteria Assessment Tool Specific to Decatur Work Release Program	ADOC008811-008812	No objection
Information for HIV+ Inmates to be Considered for or Housed at Work Release	ADOC008813-008813	No objection
Intra-System Transfer/Receiving Screening	ADOC008814-008814	No objection
E-3 Pre-Transfer Inmate Health Screening and Transfer/Receiving Screening of Inmates	ADOC008856-008865	No objection
A-8 Health Classification, Assessment Coding and Communication of Needs (9/28/10)	ADOC008866-008869	No objection
D-2 Over the Counter Medication and Keep on Person (KOP) Medication	ADOC008870-008881	No objection
B-1(e) HIV Serology in Determining Special Housing Needs; Rev. 6/10/09	ADOC008886-008889	No objection
A-8-a Medical Coding Assessment Guide, Rev. 2/2011	ADOC008893-008893	No objection
Decatur Community Based Facility Standard Operating Procedure: 4-13 (Inmate Employment and Paychecks)	ADOC008937-008942	No objection
Decatur Community Based Facility JPO Monthly Report	ADOC008943-008944	No objection
Orientation Package (9/22/09) (Tutwiler)	ADOC009005-009035	No objection

Description	Bates No.	Objection
Tutwiler Standard Operating Procedure 12-3 for Inmates with HIV/AIDS (11/28/2011)	ADOC009036-009040	No objection
Tutwiler Standard Operating Procedure 13-10 Faith/Character Based Honor Dorm (6/16/2008)	ADOC009041-009051	No objection
AR 400 Classification of Inmates (11/10/04)	ADOC009298-009302	No objection
Inmate Orientation (LCF)	ADOC009303-009317	No objection
Calhoun Community College and College System Programs	ADOC009487-009494	FRE 901 as to ADOC9488-92
Tutwiler Standards of Operation 12-3 Inmates with HIV/AIDS (5/28/10)	ADOC009801-009805	No objection
Tutwiler Standards of Operation 12-3 Inmates with HIV/AIDS (11/28/11)	ADOC009806-009810	No objection
May 2012 Work Release Employer Report (Redacted)	ADOC009927-009928	FRE 801, 802, 803*
Paul Edwards Disciplinary Report (6-4-07)	ADOC011291-011298	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Dana Harley Recommendation of Probation/Parole and Release (12-22-08)	ADOC01197	FRE 106, 401, 609
ADOC Job Lists (All Facilities)	ADOC014569-014685	No objection
SOP 13-10 Faith/Character Based Honor Dorm for Julia Tutwiler Prison for Women (6-16-08)	ADOC015589-015599	No objection (but note that this is identical to Joint Exhibit J-5)
Criteria For Inmate Placement in 8-Week Matrix Stimulant Use Disorder Program (4-19-11)	ADOC015600-015601	No objection
ADOC Recap of Expenditures (FY07-FY12)	ADOC015602-015602	FRE 401, 801, 802, 803, 901
ADOC Medical Coding Assessment Guide; Rev. 06/09	ADOC016602-016602	No objection
ADOC HIV Drug Costs Corizon Contract (Nov 2007-May2012)	ADOC016610-016612	FRE 401, 801, 802, 803, 901
January-May 2012 HIV Tests Performed by Kilby Laboratory	ADOC016613-016617	FRE 801, 802, 803, 901
December 2011-June 2012 HIV Tests Performed by Kilby Laboratory	ADOC016618-016626	FRE 801, 802, 803, 901
April 2010--December 2011 HIV Tests Performed by Kilby Laboratory	ADOC016868-016889	FRE 801, 802, 803, 901
ADOC A-8 Health Classification Assessment Coding and Communication of Needs (2-5-09)	ADOC017007-017010	No objection
Office of Health Services Division Manual/Policies and Procedures	ADOC017740-018038	No objection

Description	Bates No.	Objection
Decatur Photographs (Confidential)	ADOC018956-018974	FRE 401, 901, 1003
Limestone Photographs (Confidential)	ADOC018975-019289	FRE 401, 901, 1003
Montgomery Photographs (Confidential)	ADOC019290-019298	FRE 401, 901, 1003
Tutwiler Photographs (Confidential)	ADOC019299-019362	FRE 401, 901, 1003
Assessment of the Impact of Changing Policies and Procedures Regarding Alabama Prison Inmates Who Have Tested Positive for the AIDS Virus (HIV) by Dr. Jerry J. Ingram (February, 1989)	ADOC020435-020532	FRE 401, 403, 703, 801, 802, 803, 805
ADOC Education -Trade School	ADOC020923-020926	FRE 703, 801, 802, 803, 805, 901. Additionally, FRE 401 as to ADOC20925.
ADOC Programs Chart	ADOC020927-020930	FRE 703, 801, 802, 803, 805, 901
Expert Report -Billy Mitchem (The Correctional Approach to Housing HIV-Positive Inmates in Alabama (July 18, 2012)		FRE 801, 802, 803, 805
Expert Report -Dr. W. Brent Maulden and Dr. Jerry Ingram --Assessment and Impact of Potential Policy and Procedure Changes Regarding Alabama Prison Inmates Who Have Tested Positive For HIV (July 18, 2012)		FRE 403, 801, 802, 803, 805
Expert Report -George Lyrene, M.D. (July 18, 2012)		FRE 801, 802, 803, 805
Expert Report -Steven F. Scheibel, M.D. (July 18, 2012)		FRE 801, 802, 803, 805
Expert Report Hal White (ADOC Telemedicine Equipment Installation) (July 18, 2012)		FRE 801, 802, 803, 805
Expert Report of Dr. George Camp		FRE 801, 802, 803, 805
Dwight Smith -Certificate for complete 6 month Crime Bill (6/15/07)	Henderson000001	No objection
Dwight Smith – Values Clarification Certificate (5/24/11)	Henderson000002	No objection
Dwight Smith – Coping and Hoping Certificate 9/14/10)	Henderson000003	No objection
Dwight Smith – Making Decisions Certificate (2/9/10)	Henderson000004	No objection
Dwight Smith – Relapse Prevention Certificate (7/21/09)	Henderson000005	No objection
Dwight Smith – Rational Thinking Certificate (5/19/09)	Henderson000006	No objection
Dwight Smith – Self-Awareness Certificate (3/31/09)	Henderson000007	No objection

Description	Bates No.	Objection
Dwight Smith – Values Clarification Certificate (2/25/09)	Henderson000008	No objection
Dwight Smith – Personal Development Certificate (12/23/08)	Henderson000009	No objection
Dwight Smith – Dealings with Feelings Certificate (10/28/08)	Henderson000010	No objection
Dwight Smith – Coping Skills Group Certificate (4/29/08)	Henderson000011	No objection
Dwight Smith – Self-Awareness Group Certificate (6/10/08)	Henderson000012	No objection
Dwight Smith – Self Concept Group Certificate (7/22/08)	Henderson000013	No objection
Dwight Smith – Prison Fellowship Bible Study Certificate (4/11/08)	Henderson000014	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (6/14/08)	Henderson000015	No objection
Dwight Smith – Baptismal Certificate (3/31/08)	Henderson000016	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (2/23/08)	Henderson000017	No objection
Dwight Smith – Rational Thinking Certificate (2/5/08)	Henderson000018	No objection
Dwight Smith – Cognitive Retraining Certificate (10/2/07)	Henderson000019	No objection
Dwight Smith – Values Clarification Certificate (9/26/06)	Henderson000020	No objection
Dwight Smith – Anger Management Certificate (6/27/06)	Henderson000021	No objection
Dwight Smith – Certificate of Completion (illegible copy)	Henderson000022	No objection
Dwight Smith – Faith Bible Study Course Certificate (7/15/06)	Henderson000023	No objection
Dwight Smith – Self-Esteem Group Certificate (8/15/06)	Henderson000024	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (9/23/06)	Henderson000025	No objection
Dwight Smith – Human Sexuality and Addiction Class Certificate (9/1/06)	Henderson000026	No objection
Dwight Smith – Anger Management Certificate (2/6/07)	Henderson000027	No objection
Dwight Smith – Rational Thinking Certificate (12/26/06)	Henderson000028	No objection

Description	Bates No.	Objection
Dwight Smith – Searching the Scriptures Certificate (12/23/06)	Henderson000029	No objection
Dwight Smith – Purpose Driven Life Study Course Certificate of Completion (12/11/06)	Henderson000030	No objection
Dwight Smith – Personal Development Certificate (11/21/06)	Henderson000031	No objection
Dwight Smith – Certificate of Completion (illegible copy)	Henderson000032	No objection
Dwight Smith – Prison Fellowship Seminar Certificate of Completion (9/22/07)	Henderson000033	No objection
Dwight Smith – Study of the Book of Acts Certificate of Completion (8/31/07)	Henderson000034	No objection
Dwight Smith – Values Clarification Group Certificate (8/9/07)	Henderson000035	No objection
Dwight Smith – Criminal Thinking Group Certificate (8/14/07)	Henderson000036	No objection
Dwight Smith – Self-Awareness Group Certificate (7/3/07)	Henderson000037	No objection
Dwight Smith – Health Use of Leisure Certificate (6/21/07)	Henderson000038	No objection
Dwight Smith – Self Esteem Group Certificate (5/10/07)	Henderson000039	No objection
Dwight Smith – Lifestyles and Values Certificate (5/8/07)	Henderson000040	No objection
Dwight Smith – Cognitive Restructuring Certificate (4/5/07)	Henderson000041	No objection
Dwight Smith – Problem Solving Group Certificate (3/27/07)	Henderson000042	No objection
Dwight Smith – Certificate of Completion (illegible copy)	Henderson000043	No objection
Dwight Smith – Anger Management Certificate (11/3/06 – 2/9/07)	Henderson000044	No objection
Dwight Smith – Purpose Driven Life Certificate of Completion (4/17/07)	Henderson000045	No objection
Dwight Smith – Positive Living Program Certificate (3/2/07)	Henderson000046	No objection
Dwight Smith – Personal Development (3/30/07 – 5/18/07)	Henderson000047	No objection
Dwight Smith – Six Month Crime Bill Certificate (6/15/07)	Henderson000048	No objection
Dwight Smith – Six Month Crime Bill Certificate (6/15/07)	Henderson000049	No objection

Description	Bates No.	Objection
Dwight Smith – Self-Awareness Certificate (11/24/09)	Henderson000050	No objection
Dwight Smith – Six Month Crime Bill Certificate (6/15/07)	Henderson000051	No objection
Dwight Smith – Communications Skills (3/31/08)	Henderson000052	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (2/23/08)	Henderson000053	No objection
Dwight Smith – Baptismal Certificate (10/30/06)	Henderson000054	No objection
Dwight Smith – Faith Bible Study Course Certificate (7/15/06)	Henderson000055	No objection
Dwight Smith – Rational Thinking Certificate (2/5/08)	Henderson000056	No objection
Dwight Smith – Cognitive Retraining (10/2/07)	Henderson000057	No objection
Dwight Smith -2/5/09 Letter from Calhoun Community College re: requirements completed for a Certificate in Design Drafting/Advanced CAD.	Henderson000058	No objection
Dwight Smith – Cognitive Restructuring Certificate (4/5/07)	Henderson000059	No objection
Dwight Smith – Problem Solving Group Certificate (3/27/07)	Henderson000060	No objection
Dwight Smith – Calhoun Community College Certificate in Drafting and Advanced CAD (12/22/08)	Henderson000061	No objection
Dwight Smith – Calhoun Community College Certificate in Design Drafting and Basic Architecture (12/15/09)	Henderson000062	No objection
Dwight Smith – 6/21/10 Letter from Calhoun Community College re: requirements completed for a Certificate in Design Drafting and Basic Architecture.	Henderson000063	No objection
Dwight Smith – Values Clarification Certificate (9/26/06)	Henderson000064	No objection
Dwight Smith – Stress Management Certificate (8/4/06 – 9/22/06)	Henderson000065	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (9/22/07)	Henderson000066	No objection
Dwight Smith – Study of the Book of Acts Ch. 1-12 Certificate (8/31/07)	Henderson000067	No objection
Dwight Smith – Values Clarification Group Certificate (8/9/07)	Henderson000068	No objection
Dwight Smith – Criminal Thinking Group Certificate (8/14/07)	Henderson000069	No objection
Dwight Smith – Self-Awareness Group Certificate (7/3/07)	Henderson000070	No objection

Description	Bates No.	Objection
Dwight Smith – Healthy Use of Leisure Certificate (6/21/07)	Henderson000071	No objection
Dwight Smith – Self-Esteem Group Certificate (5/10/07)	Henderson000072	No objection
Dwight Smith – Life Styles and Values Certificate (5/8/07)	Henderson000073	No objection
Dwight Smith – Purpose Driven Life Study Course Certificate (4/17/07)	Henderson000074	No objection
Dwight Smith – Cognitive Restructuring Certificate (4/5/07)	Henderson000075	No objection
Dwight Smith – Problem Solving Group (3/27/07)	Henderson000076	No objection
Dwight Smith – Positively Living Certificate (3/2/06)	Henderson000077	No objection
Dwight Smith – Anger Management Certificate (11/3/06 – 2/9/07)	Henderson000078	No objection
Dwight Smith – Anger Management Certificate (2/6/07)	Henderson000079	No objection
Dwight Smith – Rational Thinking Certificate (12/26/06)	Henderson000080	No objection
Dwight Smith – Searching the Scriptures Certificate (12/23/06)	Henderson000081	No objection
Dwight Smith – Purpose Driven Life Certificate (12/11/06)	Henderson000082	No objection
Dwight Smith – Personal Development Certificate (11/21/06)	Henderson000083	No objection
Dwight Smith – Positive Living Certificate (date illegible)	Henderson000084	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (9/23/06)	Henderson000085	No objection
Dwight Smith – Human Sexuality and Addiction Class Certificate (9/1/06)	Henderson000086	No objection
Dwight Smith – Self-Esteem Group Certificate (8/15/06)	Henderson000087	No objection
Dwight Smith – Positively Living Certificate (date illegible)	Henderson000088	No objection
Dwight Smith – Anger Management Certificate (6/27/06)	Henderson000089	No objection
Dwight Smith – Positively Living Certificate (4/8/06)	Henderson000090	No objection
Dwight Smith – Self Esteem Group Certificate (8/15/06)	Henderson000091	No objection

Description	Bates No.	Objection
Dwight Smith – Self Esteem Group Certificate (8/15/06)	Henderson000092	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (9/23/06)	Henderson000093	No objection
Dwight Smith – Prison Fellowship Seminar Certificate (9/23/06)	Henderson000094	No objection
Dwight Smith – Positively Living Phase I, Level II (date illegible)	Henderson000095	No objection
Dwight Smith – Personal Development Certificate (11/21/06)	Henderson000096	No objection
Dwight Smith – Purpose Driven Life Certificate (12/11/06)	Henderson000097	No objection
Dwight Smith – Searching the Scriptures Certificate (12/23/06)	Henderson000098	No objection
Dwight Smith – Rational Thinking Certificate (12/26/06)	Henderson000099	No objection
Dwight Smith – Anger Management Certificate (2/6/07)	Henderson000100	No objection
Dwight Smith – Anger Management Certificate (11/3/06 – 2/9/07)	Henderson000101	No objection
Dwight Smith – 6/28/11 Letter of recommendation from Stephen Cranford	Henderson000102	No objection
Dwight Smith – 6/28/11 Letter of recommendation from Stephen Cranford	Henderson000103	No objection
Dwight Smith -2/5/09 Letter from Calhoun Community College re: requirements completed for a Certificate in Design Drafting/Advanced CAD.	Henderson000104	No objection
Dwight Smith – Certificate of Design Drafting/ CAD from Calhoun Community College (12/15/08)	Henderson000105	No objection
Dwight Smith – Certificate of Drafting/ Advanced CAD from Calhoun Community College (12/22/08)	Henderson000106	No objection
Dwight Smith – Certificate of Design Drafting/ Basic Architecture from Calhoun Community College (12/15/08)	Henderson000107	No objection
Dwight Smith – Certificate for being placed on the President’s List Spring Semester 2009	Henderson000108	No objection
Al-Qadeer Hamlet – Certificate of Completion in West Law research (5/24/10)	Henderson000109	No objection
Louis Henderson -Calhoun Community College Final Grade Report	Henderson000110-000111	No objection
3-20-06 Letter of Recommendation from Jennifer Lord of Prison Health Services regarding Louis Henderson	Henderson000112	FRE 401, 801, 802, 803
Louis Henderson -9/19/06 & 8/22/06 Work Supervisor’s/ Correctional Officers Reports	Henderson000113-000114	No objection

Description	Bates No.	Objection
Louis Henderson – Certificate of Completion in COPE (8/5/05)	Henderson000115	No objection
Louis Henderson – Self-Awareness Group Certificate (9/6/05)	Henderson000116	No objection
Louis Henderson – Anger Management Certificate (10/18/05)	Henderson000117	No objection
Louis Henderson – Self-Awareness Group (7/3/07)	Henderson000118	No objection
Louis Henderson – Criminal Thinking Group (8/14/07)	Henderson000119	No objection
Louis Henderson – Anger Management Certificate (9/27/07)	Henderson000120	No objection
Louis Henderson – Cognitive Retraining Certificate (10/2/07)	Henderson000121	No objection
Louis Henderson – Personal Development Certificate (11/13/07)	Henderson000122	No objection
Louis Henderson – Coping Skills Certificate (12/17/07)	Henderson000123	No objection
Louis Henderson – Rational Thinking Certificate (2/5/08)	Henderson000124	No objection
Louis Henderson – Communication Skills Certificate (3/31/08)	Henderson000125	No objection
Louis Henderson – Coping Skills Group Certificate (4/29/08)	Henderson000126	No objection
Louis Henderson – Self-Awareness Certificate (6/10/08)	Henderson000127	No objection
Louis Henderson – Managing Anxiety Certificate (6/30/08)	Henderson000128	No objection
Louis Henderson – Self-Concept Group Certificate (7/22/08)	Henderson000129	No objection
Louis Henderson – Dealing with Feelings Program Certificate (10/28/08)	Henderson000130	No objection
Louis Henderson – Personal Development Certificate (12/23/08)	Henderson000131	No objection
Louis Henderson – Values Clarification Certificate (2/25/09)	Henderson000132	No objection
Louis Henderson – Self-Awareness Certificate (3/31/09)	Henderson000133	No objection
Louis Henderson – Rational Thinking Certificate (5/19/09)	Henderson000134	No objection
Louis Henderson – Relapse Prevention Certificate (7/21/09)	Henderson000135	No objection

Description	Bates No.	Objection
Louis Henderson -Louis Henderson – Dealing with Feelings Program Certificate (8/6/09)	Henderson000136	No objection
Louis Henderson – Preparing for Change Certificate (9/22/12)	Henderson000137	No objection
Louis Henderson – Certificate of Achievement in Alternatives to Violence (10/1/09)	Henderson000138	No objection
Louis Henderson – Self-Awareness Certificate (11/24/09)	Henderson000139	No objection
Louis Henderson – Making Decisions Certificate (2/9/10)	Henderson000140	No objection
Louis Henderson – Effective Communications Certificate (5/4/10)	Henderson000141	No objection
Louis Henderson – Anger Management Certificate (5/13/10)	Henderson000142	No objection
Louis Henderson – Self Esteem Certificate (6/29/10)	Henderson000143	No objection
Louis Henderson – Self-Esteem Certificate (7/1/10)	Henderson000144	No objection
Louis Henderson – Sleep Hygiene Certificate (8/4/10)	Henderson000145	No objection
Louis Henderson – Coping and Hoping (9/14/10)	Henderson000146	No objection
Louis Henderson – Anger Management Certificate (2/8/11)	Henderson000147	No objection
Louis Henderson – Self-Esteem Certificate (4/5/11)	Henderson000148	No objection
Louis Henderson – Values Clarification Certificate (5/24/11)	Henderson000149	No objection
Louis Henderson -Anger Management Certificate (2/8/11)	Henderson000150	No objection
Louis Henderson – Self-Esteem Certificate (4/5/11)	Henderson000151	No objection
Louis Henderson -Values Clarification Certificate (5/24/11)	Henderson000152	No objection
Louis Henderson – Dignity Hospice/Palliative Care Program Certificate (6/8/11)	Henderson000153	No objection
Louis Henderson -Dignity Hospice/Palliative Care Program Certificate (6/8/11)	Henderson000154	No objection
Louis Henderson – Making Decisions Certificate (7/19/11)	Henderson000155	No objection
Louis Henderson – Identifying and Changing Certificate (9/6/11)	Henderson000156	No objection

Description	Bates No.	Objection
Louis Henderson -Anger Management Certificate (11/8/11)	Henderson000157	No objection
Louis Henderson -Anger Management Certificate (11/9/11)	Henderson000158	No objection
Louis Henderson – Stress Management Certificate (2/28/12)	Henderson000159	No objection
Louis Henderson – Rational Thinking Certificate (1/3/06)	Henderson000160	No objection
Louis Henderson – Crime Bill Drug Treatment Certificate (9/12/05 – 3/10/06)	Henderson000161	No objection
Louis Henderson – Self-Awareness (5/2/06)	Henderson000162	No objection
Louis Henderson – Values Clarification (9/26/06)	Henderson000163	No objection
Louis Henderson – Personal Development (11/21/06)	Henderson000164	No objection
Louis Henderson – Rational Thinking (12/26/06)	Henderson000165	No objection
Louis Henderson – Anger Management (2/6/07)	Henderson000166	No objection
Louis Henderson – Positively Living Phase I Level IV (3/2/07)	Henderson000167	No objection
Louis Henderson – Problem Solving Group (3/27/07)	Henderson000168	No objection
Louis Henderson -Lifestyles and Values (5/8/07)	Henderson000169	No objection
CDC website: HIV Transmission Among Male Inmates in a State Prison System – Georgia 19922005	Henderson000279-000285	No objection
March Letter from Dwight Smith to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001280	FRE 801, 802, 803 as to response by Mr. Sumner
4/20/12 Letter from Dwight Smith to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001281	FRE 801, 802, 803 as to response by Mr. Sumner
10/6/09 Letter from Dwight Smith to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001282	FRE 801, 802, 803 as to response by Mr. Sumner
6/14/11 Letter from Dwight Smith To Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001283	FRE 801, 802, 803 as to response by Mr. Sumner
5/23/11 Letter from Dwight Smith to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001284	FRE 801, 802, 803 as to response by Mr. Sumner
2/16/11 Letter from Dwight Smith to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001285	FRE 801, 802, 803 as to response by Mr. Sumner
6/5/10 Letter from Dwight Smith to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001286	FRE 801, 802, 803 as to response by Mr. Sumner

Description	Bates No.	Objection
9/28/09 Letter from Dwight Smith to Classification Specialist and response from Mr. Sumner regarding work release	Henderson001287	FRE 801, 802, 803 as to responses by Ms. Hester and Mr. Sumner
9/30/09 Letter from Dwight Smith to Classification Specialist and response from Mr. Sumner regarding work release	Henderson001288	FRE 801, 802, 803 as to response by unidentified staff member.
Letter from Alqadeer Hamlet to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001289	FRE 801, 802, 803 as to response by Mr. Sumner
Letter from Alqadeer Hamlet to Classification and response from Mr. Sumner regarding work release	Henderson001290	FRE 801, 802, 803 as to response by Mr. Sumner
11/3/10 Letter from Jeffrey Beyer to Classification and response from Mr. Sumner regarding work release	Henderson001291	FRE 801, 802, 803 as to response by Mr. Sumner
9/26/11 Letter from Jeffrey Beyer to Classification and response from Mr. Sumner regarding work release	Henderson001292-001293	FRE 801, 802, 803 as to response by Mr. Sumner
5/18/11 Letter from Jeffrey Beyer to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001294	FRE 801, 802, 803 as to response by Mr. Sumner
12/28/10 Letter from Jeffrey Beyer to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001295	FRE 801, 802, 803 as to response by Mr. Sumner
2/7/11 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001296	FRE 801, 802, 803 as to response by Mr. Sumner
2/11/11 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001297	FRE 801, 802, 803 as to response by Mr. Sumner
2/2011 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001298	FRE 801, 802, 803 as to response by Mr. Sumner
10/6/09 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001299	FRE 801, 802, 803 as to response by Mr. Sumner
12/9/09 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001300	FRE 801, 802, 803 as to response by Mr. Sumner
12/11/09 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001301	FRE 801, 802, 803 as to response by Mr. Sumner
12/15/09 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001302	FRE 801, 802, 803 as to response by Mr. Sumner
12/22/09 Letter from James Douglas to Mr. Sumner and response from Mr. Sumner regarding work release	Henderson001303	FRE 801, 802, 803 as to response by Mr. Sumner
9/24/09 Letter from James Douglas to Ms. Harris and response from Ms. Harris regarding work release	Henderson001304	FRE 801, 802, 803 as to response by Ms. Harris
Letter from Louis Henderson to Mr. Sumner and response from Mr. Sumner	Henderson001305	FRE 801, 802, 803 as to response by Mr. Sumner
4/16/12 Letter from Louis Henderson to Captain Smith regarding work release	Henderson001306	No objection
2/2/08 Letter from Dana Harley to Ms. Ruth regarding issues with Warden Albright	Henderson001307	No objection
9/6/07 Letter from Dana Harley to Governor Riley regarding women at Julia Tutwiler Women's prison with HIV	Henderson001308	No objection

Description	Bates No.	Objection
11/28/07 Letter from Dana Harley to Commissioner Allen regarding women at Julia Tutwiler Women's prison with HIV	Henderson001309	No objection
Motion for Consideration to Back Date Case No. CC-2002-1016 Circuit Court Baldwin County.	Deposition Exhibit	FRE 401
Class Action Complaint for Declaratory and Injunctive Relief, Louis Henderson, et al., v. Kim Thomas, et al., U.S.D.C. Middle District of Alabama, 2:11-cv-00224-MHT-WC.	Deposition Exhibit	No objection
Second Amended Class Action Complaint for Declaratory and Injunctive Relief, Henderson, et al. v. Thomas, et al.	Deposition Exhibit	No objection
Mississippi Department of Corrections Housing Units by Facility (6-19-12)	Deposition Exhibit	FRE 801, 802, 803, 901
April 2012 Listing or Categorical Numbering of HIV Inmates Housed in Mississippi DOC by Housing Unit.	Deposition Exhibit	FRE 801, 802, 803, 901
Madeleine LaMarre, MN, FNP-BC Curriculum Vitae	Deposition Exhibit	No objection
IDCR Special Report: Transmission of HIV within A State Prison	Deposition Exhibit	FRE 801, 802, 803, except for portions authored by Madeleine LaMarre
Leon McGhee Incident Report (11-26-04)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Leon McGhee Disciplinary Report (11-26-04 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Leon McGhee Incident Report (4-25-08)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Leon McGhee Disciplinary Report (4-25-08 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Leon McGhee Incident Report (5-20-08)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Leon McGhee Disciplinary Report (5-20-08 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Leon McGhee Disciplinary Report (1-21-09 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Leon McGhee Health Screening and Criteria Assessment Tool DWR (4-20-10)	Deposition Exhibit	FRE 401, 801, 802, 803*
Leon McGhee Classification Summary (4-27-10)	Deposition Exhibit	FRE 401, 801, 802, 803*. Additionally, FRE 401, 404(a)(1) and (b)(1), 608(b), 609, 801, 802, 803, 805 as to "Justification and Comments" section and additional handwritten notations except signatures.
Lewis Powe Disciplinary Report (10-2-02 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Lewis Powe Disciplinary Report (3-25-03 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Lewis Powe Disciplinary Report (4-17-05 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (3-17-97 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805

Description	Bates No.	Objection
Bernarthur Jones Disciplinary Report (11-20-95 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (4-9-98 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (4-12-98 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (8-21-99 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (5-29-03 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (12-3-04 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (6-5-06 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (7-11-06 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (8-5-05 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Bernarthur Jones Disciplinary Report (5-1-08 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805
Kenneth Brown Disciplinary Report (7-11-98 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805. Additionally, FRE 901 as to the pages entitled "Disciplinary Segregation Medical Documentation"
Kenneth Brown Disciplinary Report (1-6-99 incident)	Deposition Exhibit	FRE 401, 403, 404(a)(1) and (b)(1), 608(b), 801, 802, 803, 805. Additionally, FRE 901 as to the incident report and incident report control sheet that appear subsequent to the disciplinary report in the exhibit.

When "FRE 801, 802, 803" is followed by an * (asterisk), this signifies that the foregoing FRE 801, 802, 803 objection may be resolved by a showing that the requirements of Fed. R. Evid. 803(6)(D) have been satisfied.