

EXHIBIT 20

Supplemental Expert Report of Brie Williams, M.D., M.S.

Parsons v. Ryan, No. 2:12-cv-00601-NVW (MEA) (D. Ariz.)

December 9, 2013

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The following is a supplement to my expert report, dated November 8, 2013, in *Parsons v. Ryan*. My report was based on my inspection tours of three Arizona Department of Corrections (ADC) prison complexes—ASPC-Florence (Central and Kasson Units); ASPC-Eyman (SMU and Browning Units); and ASPC-Perryville (Lumley Special Management Area (SMA))—and focused in part on the inadequate exercise facilities and opportunities provided at these institutions for prisoners in the isolation units. The following supplements my report based on recently produced documents and photographs. I reserve the right to supplement or modify these opinions as additional information becomes available.

Exercise enclosures at the isolation units in all three complexes are, in almost all cases, **too small** to permit adequate exercise to preserve physical health and prevent deconditioning. In particular, for older prisoners or those with chronic medical conditions and/or mobility or functional impairments, who cannot do calisthenics and aerobic exercise in place, the enclosures are generally not large enough to allow the sustained walking that these prisoners need for exercise. My inspection confirmed that some of the enclosures have **no source of drinking water**, and some have **no source of ventilation or cooling**. My inspection also confirmed that some of the enclosures have **no chair, bench**, or any other kind of place to sit, which makes the enclosures difficult or impossible to use for older prisoners or those with mobility impairments.

Tour photographs from the isolation units at Eyman, Florence, and Perryville confirm the extremely small size of many exercise enclosures, as well as the lack of water and lack of a place to sit. For instance, the concrete exercise enclosures at Eyman have no place to sit, no water source, no windows, no misting system to cool the enclosure, no shade, and almost no equipment (a small handball was present in some enclosures). They are also too small to permit the

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sustained walking that older or chronically ill prisoners need to preserve their health. As ADC153421 makes clear, these exercise enclosures are little more than empty isolation cells with a partially open ceiling—which can expose the prisoner to severe heat.

ADC153428 shows a similarly small exercise cage at Eyman, this one with sides made of metal fencing rather than solid concrete. While it is my understanding that Eyman prisoners are allowed to bring a water bottle to exercise, these spaces afford little or no opportunity to procure additional drinking water, which is essential in the heat. The only water source for the outdoor exercise enclosures appears to be a water dispenser that is outside of and separate from the small individual cages. For the concrete enclosures, there is no water source available at all. The lack of a readily available water source creates a risk that older or medically fragile prisoners left in such an enclosure for the two-hour exercise period will have insufficient water to stay hydrated, and thus will not be able to engage in even the very limited exercise possible in the enclosure.

The exercise enclosures at Florence and Perryville are similarly inadequate. ADC154544 shows the inside of exercise cages at Kasson unit. The enclosures are very small, and have no benches or equipment. The photograph of the Kasson enclosures supports my conclusion that Kasson prisoners who have access only to these enclosures are not receiving the opportunity for meaningful exercise. Florence-CB-5 similarly has extremely small outdoor exercise cages, pictured in ADC154537. Likewise, ADC163926 demonstrates the small size of an exercise enclosure at Perryville. The area pictured is inadequate for the exercise needs of older or medically impaired Perryville prisoners, who need access to a larger area so that they can engage in sustained walking for exercise.

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My conclusions about inadequate access to exercise are supported by official grievance responses from the Arizona Department of Corrections to named plaintiff Robert Gamez. In a grievance response dated September 3, 2013, ADC staff confirm that the exercise enclosures in Browning unit have no misting system, and add that such misters are “not feasible due to the physical constraints (design) of the buildings.” PLTF-PARSONS-030782. The responding staff then state that ADC has implemented a practice of cancelling exercise when the temperature exceeds 110 degrees. Id. See also PLTF-PARSONS-030784 (response to informal complaint confirming cancellation of recreation due to temperatures in excess of 110 degrees Fahrenheit).

This is concerning for two independent reasons. First, the lack of a misting system means that this important means of cooling the body is not available in these enclosures. This may discourage prisoners from using the exercise enclosures, or indeed make it dangerous for them to do so, particularly for those who are older or medically fragile. Second, while it may be appropriate to cancel exercise on days of extreme heat, there is no mention of alternative options for exercise on those days. Thus, in the event of such cancellation, prisoners will be offered even less than the very minimal six hours a week of exercise required by ADC policy. These documents confirm my conclusion that older prisoners and those with chronic medical conditions and/or physical disabilities housed in ADC’s isolation units do not have adequate access to exercise to preserve their health and prevent deconditioning.

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Dated this 9th day of December, 2013, at San Francisco, California.

A handwritten signature in black ink, appearing to read "Brie Williams", written in a cursive style.

BRIE WILLIAMS, M.D., M.S.

Exhibit A

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Documents sent to Dr. Brie Williams, 11/8/13 – 12/9/13

Depositions

- Deposition Transcript and Exhibits: Richard Pratt, 11/7/13
- Deposition Transcript and Exhibits: Charles Ryan, 11/8/13

Miscellaneous

- PLTF-PARSONS-030781-84: Grievances, Robert Gamez

Tour Photos

- Florence (Williams tour) dated 8/14/13 (redacted): ADC154534-47
- Perryville (Williams tour) dated 8/16/13 (redacted): ADC163926-36 (sent 11/1/13; inadvertently omitted from Exhibit C to 11/8/13 report)