
Good-Faith Conference Regarding Deficient Doe-Identification Discovery; Request for Sworn Supplementation, Identification of Medical Decisionmakers, Authentication, and Preservation

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 1 attachment (286 KB)

Good-Faith Conference Regarding Deficient Doe-Identification Discovery; Request for Sworn Supplementation, Identification of Medical Decisionmakers, Authentication, and Preservation.pdf;

This document is a detailed legal correspondence requesting specific, sworn discovery responses related to medical and personnel records in a civil rights and medical treatment case.

Overview of Purpose and Scope

- The letter seeks clarification, identification, and authentication of personnel, medical records, and procedural details relevant to alleged misconduct and record disputes.

Main Issues with Existing Discovery Responses

- Responses are insufficient to identify individuals responsible for specific acts, dates, shifts, and record entries.
- Defendants provided broad lists and vague references, failing to tie personnel to specific actions or records.
- Disputes include allegations of record forgery, alteration, and inconsistent documentation, especially regarding signatures and medication records.
- The plaintiff disputes the authenticity of certain signatures and records, claiming some signatures were obtained under duress or are forged.
- Records related to medication handling, especially crushing, dissolving, and administration, are central, with disputes over whether proper approval and documentation exist.
- The letter emphasizes the need for sworn, detailed supplemental responses, including full names, job titles, roles, dates, specific acts, supervisory approvals, and record identifiers.

Key Discovery Topics and Requests

- Identification of personnel involved in medication administration, including nurses, pharmacists, and physicians, with detailed personal and professional information.
- Clarification of roles of unidentified or Doe defendants, including their shifts, actions, and involvement in medication handling and recordkeeping.
- Specific identification of individuals involved in medication decisions, especially regarding crushing Biktarvy, including pharmacists, doctors, and facility providers.
- Requests for documentation of communications, including calls, emails, pharmacy notes, and directives related to medication alteration and approval.
- Identification of jail administrators, medical staff, and command personnel involved in directives to crush or float medications.

- Preservation of original, native, and electronic records, including audit trails, metadata, and chain-of-custody information, especially for disputed documents.
- The letter highlights disputes over the authenticity of specific records, including consent forms and intake documentation, requesting production of original and source data.

Procedural and Preservation Concerns

- The plaintiff requests confirmation that a litigation hold is in place and that relevant physical and electronic materials are preserved.
- Specific records, such as consent forms, medication records, and communication logs, are identified as disputed and require authentication.
- The letter stresses the importance of identifying record creators, modifiers, and witnesses, especially for records with conflicting or suspicious entries.
- It requests detailed information about personnel involved in handling, storing, and approving medication, including chain-of-custody and transfer records.

Additional Discovery and Identification Needs

- The plaintiff seeks full identities and service information for all relevant personnel, including nurses, medical staff, command staff, and courthouse officials.
- Clarification is requested for unresolved names, such as “Spence,” and for personnel involved in medication receipt, storage, and administration.
- The letter emphasizes the importance of identifying individuals who participated in or directed the alleged medication policy, lockdown decisions, and legal mail handling.
- It also requests information about surveillance footage custodians, staffing rosters, and command structure roles.

Disputed Records and Authentication

- The plaintiff disputes the authenticity of specific records, including consent forms and intake documents, claiming signatures are forged or obtained under duress.
- Requests include original documents, audit logs, metadata, and chain-of-custody data to verify record integrity.
- Disputes extend to medication records showing inconsistent entries, timing, and documentation of altered medication handling.
- The letter calls for production of native electronic records, including audit trails, revision histories, and communication logs related to medication decisions and record creation.

Conclusion and Next Steps

- The plaintiff demands sworn, detailed supplemental responses within 14 days, ideally by August 3, 2026.
- A conference is requested to resolve disputes and clarify record identification.
- The letter warns that failure to address deficiencies may lead to further court motions, authentication requests, and preservation orders.



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