

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

EDWARD BANKS, *et al.*,

Plaintiffs,

v.

QUINCY BOOTH, *et al.*,

Defendants.

Civil Action No. 20-00849 (CKK)

SECOND NOTICE IN RESPONSE TO THE COURT’S APRIL 1, 2020 ORDER

Pursuant to the Court’s Order of March 31, 2020 and the Minute Order of April 1, 2020, defendants attach declarations from the following Department of Corrections employees, provided in support of defendants’ forthcoming Opposition to plaintiffs’ Application for Temporary Restraining Order:

1. Camile Williams, Deputy Director, Programs and Case Management
2. Kathleenjo Landerkin, Deputy Warden, Correctional Treatment Facility

Dated: April 2, 2020.

Respectfully submitted,

KARL A. RACINE
Attorney General for the District of Columbia

TONI MICHELLE JACKSON
Deputy Attorney General
Public Interest Division

/s/ Fernando Amarillas
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Civil Action No. 20-00849 (CKK)

DECLARATION OF CAMILE WILLIAMS

Pursuant to 28 U.S.C. § 1746, I, Camile Williams, declare and state as follows:

1. I am over the age of eighteen (18) years, competent to testify to the matters contained in this declaration, and testify based on my personal knowledge and information, including information provided to me by other District of Columbia employees in the course of my official duties.

2. I am the Deputy Director, Programs and Case Management of the District of Columbia Department of Corrections (DOC). In this role, my duties include the overall management and oversight of programs and case management services. I have worked for DOC since August of 2018.

3. I provide this declaration to inform the Court about efforts by DOC to ensure that the agency's residents have legal calls with their attorneys.

4. Recently, as a result of the COVID-19 virus, legal visits to DOC's correctional facilities have decreased drastically and the agency has received an unprecedented number of requests for legal calls from attorneys representing residents in DOC's custody.

5. To facilitate the legal calls of the residents in DOC's custody, DOC's case management team has coordinated legal calls between its residents and their attorneys and allowed the residents to use their unrecorded, unmonitored desk phones to make legal calls.

6. DOC's Case Management also entered into an agreement with the Public Defender Service of the District of Columbia (DC PDS) regarding legal calls to their clients. Notably, each weekday morning, by 9:00 am, Case Management receives a list of requested legal calls from DC PDS's Deputy Trial Chief. Case Management then has all of the requested residents made available for their legal calls.

7. On Friday, March 27, 2020, DOC developed a new telephone system with its telecommunication partners, whereby each resident is allowed to make a free, unrecorded and unmonitored 10-minute call, each day, to the registered number of their attorney of record. The new system removes Case Management from the process except for verifying the attorneys' numbers and ensuring that the numbers are uploaded into the new system. Case Management has been uploading private attorneys' numbers to the new system as they receive them.

8. On Tuesday, March 31, 2020, DOC was informed that DC PDS's list of attorney names and numbers would not be ready until Friday, April 3, 2020.

9. Despite this new process, Case Management is making all reasonable efforts to ensure that all inmates can have access to legal calls.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on April 2, 2020



CAMILE WILLIAMS

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DECLARATION OF KATHLEEN JO LANDERKIN

Pursuant to 28 U.S.C. § 1746, I, Kathleen Jo Landerkin, declare and state as follows:

1. I am over the age of eighteen (18) years, competent to testify to the matters contained in this declaration, and testify based on my personal knowledge and information, including information provided to me by other District of Columbia employees in the course of my official duties.

2. I am the Deputy Warden with the District of Columbia the District of Columbia Department of Corrections' (DOC) Central Detention Facility (CDF). In this role, I am responsible for the care and well-being of all residents housed in DOC's CDF. I am also responsible for the supervision of all DOC uniformed staff at the CDF. I have worked for DOC since January 2018.

3. I provide this declaration to inform the Court of DOC's videoconference capabilities with the court.

4. Presently, DOC is hosting video/teleconferenced hearings in three different areas for three different courts. Notably, DOC host hearings for the United States District Court for the District of Columbia, the United States District Court for Maryland and the Superior Court of the District of Columbia.

5. In accordance with a meeting DOC had last week with Chief Judge Howell of the United States District Court for the District of Columbia, each court has its own video/teleconferencing module at DOC where residents can video conference with the court for hearings and call their attorneys before and after their hearings.

6. At times there have been technology issues and delays as facility staff have adjusted to new processes but, overall, over the last month, DOC has gone from having no video or telephone court hearings in our facilities to three different areas for hearings with minimal problems. DOC's IT and operations staff are committed to increasing the capabilities for these hearings.

7. Also, as of the date of the is declaration, there are 125 residents quarantined in DOC's facilities.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on April 2, 2020

Kathleen Jo Landerkin
KATHLEEN JO LANDERKIN