UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Laddy Curtis Valentine, *et al.*, *Plaintiffs*, v. Bryan Collier, *et al.*, *Defendants*.	)	Case No. 4:20-cv-01115 Hon. Keith P. Ellison

Plaintiffs' Emergency Supplemental Motion for Certification of Two Additional Subclasses

TABLE OF CONTENTS

Page

I. Factual Background 2

A. TDCJ Discriminates Against Sick and Disabled Inmates in Conditions Likely to Spread the Virus 3

B. TDCJ Discriminates Against the Mobility Impaired 5

II. Issue Presented 6

III. Argument and Authorities 7

A. The Proposed Subclasses Satisfy Numerosity 7

B. The Proposed Subclasses Satisfy Commonality 8

C. The Proposed Subclasses Satisfy Typicality 12

D. The Proposed Subclasses Satisfy the Adequacy Requirement 14

E. The Proposed Subclasses Meet Rule 23(b)(2)'s Requirements 14

F. The Court Should Appoint the Same Class Counsel Under Rule 23(g) 14

IV. Conclusion 15

TABLE OF AUTHORITIES

Page(s)

Cases

Ahlman v. Barnes,
No. 20-cv-835, 2020 WL 2754938 (C.D. Cal. May 26, 2020) 2, 14

Bennett-Nelson v. La. Board of Regents,
431 F.3d 448 (5th Cir. 2005) 9

Bumgarner v. NCDOC,
276 F.R.D. 452 (E.D.N.C. 2011) 10, 12, 14

Clarke v. Lane,
267 F.R.D. 180 (E.D. Pa. 2010) 10

Cole v. Collier,
No. 4:14-cv-1698, 2017 WL 3049540 (S.D. Tex. July 19, 2017) 3, 7

Cole v. Livingston,
No. 4:14-cv-1698, 2016 WL 3258345 (S.D. Tex. June 14, 2016) 13, 14

Dodson v. CoreCivic,
No. 3:17-cv-48, 2018 WL 4776081 (M.D. Tenn. Oct. 3, 2018) 10

Fraihat v. U.S. Immig. & Customs Enf't,
No. 19-cv-1546, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020) 2

Hernandez v. Cnty. of Monterey,
305 F.R.D. 132 (N.D. Ca. 2015) 10, 14

Lightbourn v. County of El Paso, Tex.,
118 F.3d 421 (5th Cir. 1997) 9

Luedecke v. Tenet Healthcare Corp.,
No. 3:14-cv-1582, 2015 WL 3867793 (N.D. Tex. June 23, 2015) 13

Martin v. St. Luke's Episcopal Hosp.,
No. 13-cv-0718, 2014 WL 4810303 (S.D. Tex. Sept. 23, 2014) 13

Martone v. Livingston,
No. 4:13-cv-3369, 2014 WL 3534696 (S.D. Tex. July 16, 2014) 9

McCoy v. Texas Department of Criminal Justice,
No. 5-cv-370, 2006 WL 2331055 (S.D. Tex. Aug. 9, 2006) 9

Melton v. Dallas Area Rapid Transit,
391 F.3d 669 (5th Cir. 2004) 9

Mullen v. Treasure Chest Casino, LLC,
186 F.3d 620 (5th Cir. 1999) 8, 12

Postawko v. Mo. Dep't of Corr.
910 F.3d 1030 (8th Cir. 2018) 10

Smith v. Harris Cnty., Tex.,
956 F.3d 311 (5th Cir. 2020) 9

Sulima v. Tobyhanna Army Depot,
602 F.3d 177 (3d Cir. 2010).....13

U.S. v. Georgia,
546 U.S. 151 (2006).....9

Wal-Mart Stores, Inc. v. Dukes,
564 U.S. 338 (2011).....12

Yates v. Collier,
868 F.3d 354 (5th Cir. 2017) 10, 11

Statutes

Americans with Disabilities Act ..... *passim*

The Rehabilitation Act of 1973, 29 U.S.C. § 794(a) (2006)..... *passim*

Other Authorities

28 C.F.R. § 36.104(iii).....13

Fed. R. Civ. P. 23 ..... *passim*

As Plaintiffs accurately predicted, information learned through recent discovery and at trial warrants certifying two additional subclasses of the already certified general class.[1] Recent evidence shows that inmates with disabilities, including those who are non-ambulatory, are at a heightened risk of contracting Covid-19 because they have difficulty making their way to a sink to wash their hands frequently enough. Even when they do manage to wash their hands, those inmates who use mobility-assist devices like walkers and wheelchairs immediately re-contaminate themselves when they use those devices to move back to their cubicles.

Recent discovery and trial testimony have shown, for example, that immediately after wheelchair-bound inmates wash their hands, they must touch the wheelchair's wheels to roll themselves back to their cubicles. Because those wheels are in constant contact with the floor—where the virus can lurk undetected—wheelchair-bound inmates re-contaminate their hands *right after they wash them*, with no ability to disinfect themselves back at their cubicles before they eat a meal or turn in for the night.

Inmates with disabilities, including serious medical maladies like diabetes, chronic kidney disease, COPD, and others, have not been afforded reasonable accommodations to provide the increased protection they need to guard them against Covid-19. If disabled inmates become infected, the health consequences can be much more severe for them than for healthy, non-disabled inmates. While inmates with disabilities are at an increased risk of serious illness and death from Covid-19, TDCJ does nothing to increase protections against Covid-19 for those inmates.

[1] Plaintiffs noted in their original class-certification motion that "additional discovery" could reveal that more subclasses would be necessary. *See* Mot. for Class Cert. 21 n.88, ECF No. 98. Plaintiffs were right, and they therefore now file this supplemental motion to address the need for certifying two more subclasses. *Id.* n.88.

The unique and serious risks Covid-19 poses to sick, non-ambulatory, or otherwise disabled inmates, coupled with TDCJ's inaction, warrant the immediate certification of two additional, discrete subclasses. Plaintiffs therefore supplement their previous emergency class-certification motion and now ask the Court to amend its earlier certification order to also certify a Disability Subclass and a Mobility-Impaired Subclass, as defined below. At least two district courts have similarly certified classes for disability-related claims in Covid-19 litigation brought by disabled prisoners and detainees, and this Court should follow the lead of those district courts.[2]

I. Factual Background

The facts are the same as those already laid out in Plaintiffs' original emergency motion for class certification (ECF No. 98) and in their reply brief supporting that motion (ECF No. 137),[3] except that now, the situation inside the Pack Unit has grown even more dire since then. After Plaintiffs filed their class-certification reply brief, the Fifth Circuit vacated the preliminary injunction, based in part on Defendants' unsworn representation that they had "substantially complied" with the terms of the Court's preliminary injunction. *See* Order of the Fifth Circuit, ECF No. 163 (June 29, 2020) (per curiam). Discovery and trial testimony in the case, however, undermines the representations Defendants made to the Fifth Circuit and shows that Defendants aren't doing what they should to protect those within their charge from Covid-19's ravages. Indeed, since the preliminary injunction was vacated, more inmates with Covid-19 have

[2] *See*, *e.g.*, *Ahlman v. Barnes*, No. 20-cv-835, 2020 WL 2754938, at *7–8 (C.D. Cal. May 26, 2020) (certifying facility-wide class of disabled and medically vulnerable detainees challenging COVID-19 precautions); *Fraihat v. U.S. Immig. & Customs Enf't*, No. 19-cv-1546, 2020 WL 1932570, at *18 (C.D. Cal. Apr. 20, 2020) (certifying system-wide class of ICE detainees concerning government's COVID-19 response).

[3] Plaintiffs incorporate here by reference both their amended motion for class certification and their reply brief in support of that motion.

perished—a total of nineteen Pack inmates have died by last count—and scores more have been hospitalized. Hundreds have tested positive.[4] The situation inside Pack has become even more desperate in recent weeks. The increasingly dire situation calls for further action, and the new evidence recently adduced warrants certification of two additional subclasses.

A. TDCJ Discriminates Against Sick and Disabled Inmates in Conditions Likely to Spread the Virus

TDCJ has disclosed in a sworn interrogatory answer that over 270 inmates at Pack have one or more of the following disabilities or serious health conditions:[5]

a. Asthma;
b. Body-mass index at or over 40;
c. Cystic Fibrosis;
d. Congestive Heart Failure;
e. Chronic obstructive pulmonary disorder (COPD);
f. Cirrhosis;
g. Diabetes;
h. HIV or AIDS;
i. Prolonged use of corticosteroids;
j. Chronic kidney disease (or regularly undergo dialysis).[6]

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[4] *See*, *e.g.*, **Ex. C**, Trial Tr. Vol. 3, 92:15–23 (Warden Herrera's testimony that he agrees that 19 of the men at the Pack Unit who tested positive for Covid-19 have died); *see also* **Ex. E,** Trial Tr. Vol. 6, 72:16–24 (Secretary Vail's testimony that he is aware there have been around 500 positive Covid-19 cases at Pack and 19 associated deaths).

[5] *See* **Ex. G**, Verification of J. Pulvino with attachments (***filed under seal***). For clarity, Plaintiffs have excluded from this count any Pack Unit inmate who is over the age of 65, because Defendants' interrogatory response did not indicate whether inmates who were over 65 also had disabilities or serious health conditions. It stands to reason that they do—which would of course increase beyond 270 the total number of Pack inmates with disabilities or serious health conditions. Indeed, as this Court observed in a 2017 preliminary injunction order involving the Pack Unit, a large number of Pack inmates face significant health issues including diabetes, coronary artery disease, and other ailments. *See Cole v. Collier*, No. 4:14-cv-1698, 2017 WL 3049540, at *4 (S.D. Tex. July 19, 2017).

[6] During the course of this litigation, Plaintiffs asked Defendants to also identify Pack inmates who had other serious health conditions, including uncontrolled hypertension, chronic lung disease, immune deficiencies, and

During recent depositions and at trial, various inmates have confirmed that they indeed suffer from these serious health conditions and disabilities.[7] These serious health conditions and disabilities substantially impair the affected inmates' resilience to Covid-19 and decrease the likelihood that they would survive the disease without resulting permanent injuries.[8] Indeed, people with these disabilities are at serious risk of developing severe complications from Covid-19 compared to non-disabled inmates, and they thus require additional protection to guard against contracting the disease.[9] Despite the prevalence of Pack inmates who are afflicted with these serious conditions, Defendants have done nothing to protect this unique and particularly vulnerable population from contracting Covid-19.[10]

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liver disease—but Defendants refused, incorrectly claiming that the requested information is somehow "vague, ambiguous, and overbroad." *See* **Ex. H**, Defs.' 3d Suppl. Resp. to Interrog. No. 5.

[7] *See*, *e.g.*, **Ex. I**, A. Smith Dep. Tr. 8:2–7; **Ex. J**, Pennington Dep. Tr. 13:22–14:4; **Ex. K**, Butaud Dep. Tr. 11:6–10; **Ex. L**, Beal Dep. Tr. 10:7–11:8; *see also* **Ex. A**, Trial Tr. Vol. 1, 148:20–149:150–3.

[8] *See* Decl. of Dr. Jeremy Young, M.D., ECF No. 94-94; Decl. of Dr. Robert Cohen, M.D., ECF No. 94-95; Decl. Dr. Joseph Gathe, M.D., ECF No. 94-97; *see also* excerpts from Apr. 16, 2020 Hr'g Tr. ECF No. 94-92; World Health Organization, Rpt. of the WHO-China Joint Mission on Coronavirus Disease 2019 (COVID-19), at 12 (Feb. 28, 2020) ECF No. 94-22 (finding fatality rates for patients with COVID-19 and comorbid conditions to be: "13.2% for those with cardiovascular disease, 9.2% for diabetes, 8.4% for hypertension, 8.0% for chronic respiratory disease, and 7.6% for cancer"); Weijie Guan *et al.*, Comorbidity and its impact on 1,590 patients with COVID-19 in China: A Nationwide Analysis, medRxiv, (Feb. 27, 2020) at 5, ECF No. Doc. 94-23 (finding that even after adjusting for age and smoking status, patients with COVID-19 and comorbidities of chronic obstructive pulmonary disease, diabetes, hypertension, and malignancy were 1.79 times more likely to be admitted to an ICU, require invasive ventilation, or die, the number for two comorbidities was 2.59); Fei Zhou *et al.*, Clinical course and risk factors for mortality of adult inpatients with COVID-19 in Wuhan, China: a retrospective cohort study, *The Lancet* (March 11, 2020), tb. 1, ECF No. 94-27, (finding that among hospital patients, who tended to be older, of those who had COVID-19 and died, 48% had hypertension, 31% had diabetes, and 24% had coronary heart disease).

[9] *See generally* Young Decl. ¶ 5, 19–21, ECF No. 94-94.

[10] *See*, *e.g.*, **Ex. M**, Herrera Dep. Tr. 108:4–14; **Ex. E**, Trial Tr. Vol. 6, 75:4–15 (testimony from Secretary Vail, noting that in his expert opinion, "Texas has not done what they need to do to respond to the risk of the virus within this vulnerable population.")

B. TDCJ Discriminates Against the Mobility Impaired

The Pack Unit is a single-level facility with several dormitories designed for inmates with wheelchairs or other mobility-assistance devices. Plaintiff Valentine is among the many inmates at Pack who requires the use of a walker to ambulate. **Ex. N**, Valentine Dep. Tr. 36:16–37:20.[11] At least 40—and perhaps many more—Pack inmates require wheelchairs.[12] With the arrival of Covid-19 at the Unit, these inmates face obvious heightened vulnerability compared to those able to ambulate without a mobility-assist device.

Unlike other ambulatory inmates, inmates confined to wheelchairs or who must use walkers cannot move around easily to wash their hands frequently, and certainly cannot ambulate to a sink without touching their mobility-assist device while moving to and from a washing station. Inmates in wheelchairs must constantly touch the chair's wheels or its push-rings to move around, and yet those wheels and rings quickly become coated in the same dust, dirt, and pathogens present on the ground.[13]

As a result, the mobility-impaired inmates are far *more* likely to come into contact with surfaces and objects contaminated with the virus, even though they are far *less* likely to be able to properly clean and disinfect their hands to prevent infecting themselves and others.[14] These

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[11] Other Pack Unit inmates use walkers, too. *See*, *e.g.*, **Ex. J**, Pennington Dep. Tr. 13:22–24.

[12] *See*, *e.g.*, **Ex. F**, Trial Tr. Vol. 6, 246:4–8 (testimony from the Pack Unit's Major Sullivan, noting that he is aware that there are at least 40 inmates—and perhaps more—who are in wheelchairs). The record also reflects that the current occupancy of the original wheelchair-accessible dormitories at Pack—i.e., dorms A-2 and A-4—is 50. *See generally* **Ex. O**, Pack Unit Roster (May 26, 2020) (identifying inmates assigned to A-2 and A-4 dorms). Inmates also have recently testified in deposition and at trial that they are confined to, or must use, wheelchairs. *See* **Ex. P**, Michael Smith Dep. Tr. 9:16–24; **Ex. Q**, Dove Dep. Tr. 8:25–9:4; **Ex. R**, Jones Dep. Tr. 59:10–60:13.

[13] **Ex. D**, Trial Tr. Vol. 4, 233:19–234:18; *see also*, *e.g.*, **Ex. B**, Trial Tr. Vol. 2, 94:10–96:16; **Ex. R**, Jones Dep. Tr. 59:10–60:13.

[14] **Ex. D**, Trial Tr. Vol. 4, 233:19–234:18; **Ex. E**, Trial Tr. Vol. 6, 87:12–88:18 (Plaintiffs' expert, Secretary Vail, noted that "I think it's very clear from the trial testimony and the depositions -- the trial testimony and the

inmates need greater protections from Covid-19 than the average inmate who isn't disabled does. Even TDCJ's written, aspirational plan—which Plaintiffs will show Defendants fall short of—makes no accommodation for this category of Pack inmates. Specifically:

1. Defendants have no schedule of cleaning surfaces, including the floors, faucets, and other objects that the mobility impaired cannot avoid touching;

2. Defendants have not adequately increased the supply of cleaning fluids and tools for inmates who are responsible for sanitizing dormitories, including dormitories housing those with mobility impairments who cannot wash their hands without then immediately touching a common surface or another potentially contaminated object (for example, their wheelchairs);

3. Defendants continue to deny inmates access to personal cleaning supplies, making it impossible to thoroughly clean and disinfect their cubicle areas and their mobility-assist devices;

4. Defendants have otherwise failed to clean common surfaces to which they expose those who are mobility impaired; and

5. Defendants have not provided hand sanitizer to allow inmates to clean their hands, including for those using wheelchairs and walkers and who have no other way to keep their hands disinfected after they wash them.

II. Issue Presented

Laddy Valentine and Richard King are the named Plaintiffs in this class action case. They seek injunctive and declaratory relief on behalf of themselves and others who are similarly situated. Plaintiffs hereby move this Court to certify the proposed two additional subclasses as fol-

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depositions that it is difficult, if not impossible, for some of those mobility-impaired people to keep their hands clean").

lows, for a class period from the present until protections against Covid-19 are no longer necessary:

> **The Disability Subclass:** All current and future inmates incarcerated in the Texas Department of Criminal Justice Wallace Pack Unit who suffer from a disability that substantially limits one or more of their major life activities, are subjected to TDCJ and the Texas Correctional Managed Health Care Committee's policy and practice of failing to provide protection from exposure to Covid-19 during the class period, and who are at increased risk of serious illness, injury, or death if exposed to Covid-19 due to their disability and any medical treatment necessary to treat their disability.
>
> *Plaintiffs Valentine and King are similarly situation to the Disability Subclass.*

> **The Mobility-Impaired Subclass:** All current and future inmates incarcerated in the Texas Department of Criminal Justice Wallace Pack Unit who suffer from a disability that substantially limits one or more of their major life activities, are subjected to TDCJ and the Texas Correctional Managed Health Care Committee's policy and practice of failing to provide protection from exposure to Covid-19 during the class period, and who require the use of a walker, cane, or wheelchair to ambulate.
>
> *Plaintiff Valentine is similarly situation to the Mobility-Impaired Subclass.*

III. Argument and Authorities[15]

Plaintiffs' proposed subclasses meet all of the applicable requirements for certification under Rule 23.

A. The Proposed Subclasses Satisfy Numerosity

The numerosity standard is identical to that addressed in Plaintiffs' original class certification motion. *See* Mot. for Class Cert., ECF No. 98; *see also* Fed. R. Civ. P. 23(a)(1). Here, the proposed Disability Subclass is currently expected to include at least 270 members—and likely

[15] The legal standard and legal bases for class certification are discussed at length in Plaintiffs' original class-certification motion, in Plaintiffs' reply brief supporting that motion, and in the Court's order granting certification. For that reason, Plaintiffs will not unnecessarily repeat all of that here. *See* Emerg. Mot. for Class Cert. 21–23, ECF No. 98; Pls.' Reply Br., ECF No. 137; Order Granting Cert., ECF No. 160. Plaintiffs incorporate here by reference their original motion and their reply brief.

many more.[16] All members of the Disability Subclass are subject to the same unnecessary Covid-19 exposure from Defendants' refusal to take steps to adequately protect this uniquely vulnerable group. In addition, mere joinder of all the inmates in this subclass would result in an undeniably inefficient resolution of a single issue, running counter to the judicial economy certification provides.

The Mobility-Impaired Subclass is also numerous, albeit with somewhat fewer members. A Pack Unit roster reflects that at least 50 inmates are wheelchair-bound, as they occupy the original wheelchair-accessible dormitories—i.e., dorms A-2 and A-4. *See generally* **Ex. O**, Pack Unit Roster (May 26, 2020) (identifying inmates assigned to A-2 and A-4 dorms). And Major Sullivan just testified that he is aware that 40 or more Pack inmates are confined to wheelchairs. **Ex. F**, Trial Tr. Vol. 6, 246:4–8. Plaintiffs estimate that many more Pack Unit inmates use walkers, canes, or other mobility-assist devices. *See*, *e.g.*, **Ex. N**, Valentine Dep. Tr. 36:16–37:20. This easily satisfies the numerosity requirement. *See generally Mullen v. Treasure Chest Casino, LLC*, 186 F.3d 620, 624 (5th Cir. 1999) (citing with approval authority suggesting that classes of more than forty members should raise a presumption that joinder is impracticable).

Both proposed subclasses will also have unknown future members, once the prison lifts the precautionary lockdown and new prisoners are housed at Pack. *See* Order 20, ECF No. 160. Accordingly, the proposed Disability subclass and Mobility-Impaired subclasses easily meet Rule 23's numerosity requirement. *See* Fed. R. Civ. P. 23(a)(1).

B. The Proposed Subclasses Satisfy Commonality

The proposed subclasses meet Rule 23(a)(2)'s commonality requirement. The standard for commonality here is the same as discussed in Plaintiffs' original certification motion. *See*

[16] *See*, *e.g.*, *Cole v. Collier*, No. 4:14-cv-1698, 2017 WL 3049540, at *4 (S.D. Tex. July 19, 2017); *see also* f.n. 5, *supra*.

Mot. 25–33, ECF No. 98; *see also* Order 20–24, ECF No. 160. Both of these proposed subclasses present new common questions relating the Americans with Disabilities Act and Rehabilitation Act claims that Plaintiffs have alleged.

A claim under the ADA and Rehabilitation Act requires that a plaintiff prove (1) that he is a qualified individual within the meaning of the act; (2) that he is being excluded from participation in, or being denied benefits of, services, programs, or activities for which the public entity is responsible, or is otherwise being discriminated against by the public entity; and (3) that such exclusion, denial of benefits, or discrimination is by reason of his disability. *Lightbourn v. County of El Paso, Tex.*, 118 F.3d 421, 428 (5th Cir. 1997).[17]

When a person has a qualifying disability, the ADA and Rehabilitation Act require public entities to provide a "reasonable accommodation" to assist the person in accessing public programs and services. *Melton v. Dallas Area Rapid Transit*, 391 F.3d 669, 672 (5th Cir. 2004). TDCJ's failure to accommodate a prisoner is "discrimination" under both statutes.[18] This Court held in *McCoy v. Texas Department of Criminal Justice* that, in the prison context, a "failure to make reasonable accommodations to the needs of a disabled prisoner may have the effect of discriminating against that prisoner because the lack of an accommodation may cause the disabled prisoner to suffer more pain and punishment than non-disabled prisoners. No. 5-cv-370,

[17] "The close relationship between Section 504 of the Rehabilitation Act and Title II of the ADA means that precedents interpreting either law generally apply to both." *Smith v. Harris Cnty., Tex.*, 956 F.3d 311, 317 (5th Cir. 2020); *see also Bennett-Nelson v. La. Board of Regents*, 431 F.3d 448, 455 (5th Cir. 2005). The Rehabilitation Act adds only the requirement that the entity also receive federal funding. *See* 42 U.S.C. § 12133 ("The remedies, procedures, and rights set forth in section 505 of the Rehabilitation Act of 1973 shall be the remedies, procedures and rights this title provides to any person alleging discrimination on the basis of disability in violation of [Title II of the ADA]"); 29 U.S.C. § 794(a) (2006).

[18] To succeed on a failure-to-accommodate claim, a plaintiff ultimately must prove: "(1) he is a qualified individual with a disability; (2) the disability and its consequential limitations were known by the covered entity; and (3) the entity failed to make reasonable accommodations." *Smith*, 956 F.3d at 317 (internal quotation marks and citation omitted).

2006 WL 2331055, *7 (S.D. Tex. Aug. 9, 2006) (Jack, J.); *see also U.S. v. Georgia*, 546 U.S. 151 (2006); *Martone v. Livingston*, No. 4:13-cv-3369, 2014 WL 3534696, *16 (S.D. Tex. July 16, 2014) (Ellison, J.). Thus, the ADA and Rehabilitation Act both protect inmates with disabilities, like the Plaintiffs here.

In fact, the Fifth Circuit has expressly found that the commonality requirement was satisfied in certifying classes of prisoners asserting ADA and Rehabilitation Act claims. *See Yates v. Collier*, 868 F.3d 354, 366 (5th Cir. 2017) (common questions included failure to accommodate disabilities that affect ability to withstand extreme heat). The Fifth Circuit's decision is hardly exceptional: Other courts have found Rule 23(a) commonality is satisfied in class action cases where ADA and Rehabilitation Act reasonable-accommodation claims are at play. *See*, *e.g.*, *Dodson v. CoreCivic*, No. 3:17-cv-48, 2018 WL 4776081, at *3–4 (M.D. Tenn. Oct. 3, 2018) (disabled inmates who claimed prison failed to accommodate their disabilities satisfied commonality); *Hernandez v. Cnty. of Monterey*, 305 F.R.D. 132, 158 (N.D. Ca. 2015) (common questions included failure to accommodate disabilities); *Bumgarner v. NCDOC*, 276 F.R.D. 452, 456 (E.D.N.C. 2011) (same); *Clarke v. Lane*, 267 F.R.D. 180, 196 (E.D. Pa. 2010) (same); *see also Postawko v. Mo. Dep't of Corr.* 910 F.3d 1030, 1038 & n.4 (8th Cir. 2018) (commonality satisfied as to ADA claim in case involving inmates with Hepatitis C who sought to implement a screening procedure to reduce future transmission). As the court noted in *Bumgarner*: "In a lawsuit wherein individuals with varying disabilities challenge policies and practices that affect all of the putative class members, factual differences regarding their disabilities does not defeat commonality." 276 F.R.D. at 456.

In *Yates*, the Fifth Circuit affirmed class certification for a subclass asserting ADA and Rehabilitation Act claims in the prison context. 868 F.3d at 366. The court found that in addition

to sharing the same common question identified for the general class, the disability subclass had the "additional common contention that TDCJ officials failed to provide reasonable accommodations to inmates suffering from disabilities that may impact their ability to withstand extreme heat." *Id.* Differences in underlying medical conditions and disabilities did not defeat commonality or class certification. *Id*.

The proposed Disability and Mobility-Impaired Subclasses present at least these common questions:

1. Are the members of the Disability Subclass (a) persons with a diagnosis of a disability that substantially limits one or more of their major life activities; and (b) either a person with a disability that increases the risk of illness, injury, or death, or a person who receives any medical treatment necessary to treat their disability, which thereby increases the risk of illness, injury, or death?

2. Does TDCJ provide reasonable accommodations to prisoners from whom it withholds Covid-19 protections whose disabilities or treatment for their disabilities increase their risk of serious injury or death?

3. Do the ADA and Rehabilitation Act require TDCJ to make reasonable accommodations to allow members of the Mobility-Impaired Subclass to effectively clean and sanitize their hands the way ambulatory inmates can?

4. Did TDCJ fail to provide reasonable accommodations to members of the subclasses by not allowing them to clean and disinfect their hands in their cubicles, including before they eat or go to sleep?

5. Did TDCJ deny members of the subclasses access to the prison's services, programs, or activities (including, for example, hygiene services and medical care) by failing to provide them with an effective way to clean and disinfect their hands?

6. Did TDCJ fail to provide members of the subclasses with reasonable accommodations, including increased protections from contracting Covid-19 beyond whatever measures it is purportedly taking with respect to the prison system as a whole, in light of the serious risk of harm that Covid-19 poses particularly and uniquely to the members of the proposed subclasses?

These are just some of the several common questions of law and fact that will apply to the proposed Disability and Mobility-Impaired Subclasses. Rule 23(a) commonality is therefore easily satisfied.

C. The Proposed Subclasses Satisfy Typicality

As explained in the original class certification motion (ECF No. 98), the test for typicality is "not demanding" and "focuses on the similarity between the named plaintiffs' legal and remedial theories and the theories of those whom they purport to represent." *Mullen*, 186 F.3d at 625 (quotation omitted). "The commonality and typicality requirements of Rule 23(a) tend to merge." *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 349 n.5 (2011). The typicality inquiry focuses on "whether the plaintiffs and each member of the class have an interest in prevailing on similar legal claims." *Bumgarner*, 276 F.R.D. at 457. Here, because the claims across all proposed subclass members share commonality, named Plaintiffs' claims are also typical of those within the proposed subclasses.

Plaintiff King's claims are typical of those in the proposed Disability Subclass. He suffers from diabetes with diabetic neuropathy, and is 73 years old.[19] King's age and diabetes substantially impair the operation of major bodily functions, including metabolism, and, according to the CDC, those conditions place him at heightened risk of serious injury or death if he contracts Covid-19. *See* King Decl. ¶¶ 4–8, ECF No. 32.

Plaintiff Valentine is typical of both proposed subclasses. He suffers from significant hypertension, a serious heart condition that has previously contributed to a stroke, and is 69 years old.[20] According to the CDC, Valentine's serious heart condition and age likewise place him at

[19] **Ex. B**, Trial Tr. Vol. 2, 8:23–24; 10:6–22.

[20] **Ex. A**, Trial Tr. Vol. 1, 148:13–15; 148:20–150:17.

heightened risk of serious injury or death if he contracts COVID-19.[21] Valentine's claims are also typical of the Mobility-Impaired subclass because he requires a walker to ambulate.[22]

Like the members of the proposed subclasses, King and Valentine are both disabled under the ADA and the Rehabilitation Act. *See*, *e.g.*, *Cole v. Livingston*, No. 4:14-cv-1698, 2016 WL 3258345, *8 (S.D. Tex. June 14, 2016) *aff'd sub nom. Yates*, 868 F.3d 354; *Sulima v. Tobyhanna Army Depot*, 602 F.3d 177, 187 (3d Cir. 2010) (collecting cases in Seventh, Eighth, and Eleventh Circuits and holding that medication's side effect can be a "physical impairment," and can therefore create a disability, if the medication is "required in the 'prudent judgment of the medical profession'"); *Luedecke v. Tenet Healthcare Corp.*, No. 3:14-cv-1582, 2015 WL 3867793, at *4 (N.D. Tex. June 23, 2015) (holding that disability was pleaded for chronic pain caused by variety of disorders because pain restricted mobility, flexibility, thinking, sleeping, and other activities); *Martin v. St. Luke's Episcopal Hosp.*, No. 13-cv-0718, 2014 WL 4810303, at *7 (S.D. Tex. Sept. 23, 2014) (denying summary judgment because plaintiff had shown a dispute of fact as to whether her high blood pressure was a disability).[23]

Like all other members of the proposed subclasses, King and Valentine have been denied adequate protection from Covid-19 contrary to the CDC's guidance. *See* Young Decl. ¶ 22, ECF No. 94-95. As class representatives, King's and Valentine's claims are thus typical of the proposed subclasses' claims in that they allege TDCJ failed to reasonably accommodate their disabilities. Their claims—like those of the members of the proposed subclasses—all "arise from

[21] *See* Centers for Disease Control & Prevention, "Coronavirus Disease 2019 (COVID-19): People who are at higher risk of severe illness" (April 15, 2020), ECF No. 94-3; *see also* Young Decl. ¶¶ 17, 19, ECF No. 94-95 (noting that serious illness and death from COVID-19 is most common among the elderly and those with underlying health conditions).

[22] **Ex. A**, Trial Tr. Vol. 1, 150:4–17.

[23] *See also* 28 C.F.R. § 36.104(iii) (physical or mental impairment includes, among other things, cancer, heart disease, diabetes, emotional illness, tuberculosis, drug addiction, and alcoholism).

the same operative facts in that they all suffer the same injury as a result of [the prison's] policies and procedures …." *Bumgarner*, 276 F.R.D. at 457. Plaintiffs have therefore satisfied the typicality requirement as to the proposed subclasses.[24]

D. The Proposed Subclasses Satisfy the Adequacy Requirement

The adequacy analysis is the same as that which was discussed in Plaintiffs' original class-certification motion and applies here with equal force. *See* Mot. for Class Cert. 36–41, ECF No. 98. Plaintiffs easily fulfil this requirement for the two new proposed subclasses.

E. The Proposed Subclasses Meet Rule 23(b)(2)'s Requirements

The analysis under Rule 23(b)(2) is likewise the same as that which was discussed in the original motion. *See* Mot. 41–42, ECF No. 98. On top of the policies, practices, and conditions that may be relevant to the general class and the high-risk subclass already certified by the Court, the Mobility-Impaired and Disability Subclasses may need additional relief that is uniquely important to their disabilities. That relief, however, will still be only to modify whatever ineffective precautions Defendants have purportedly implemented, or failed to implement as to "the class as a whole." Fed. R. Civ. P. 23(b)(2). Thus, Plaintiffs' proposed subclasses meet the requirements of Rule 23(b)(2).

F. The Court Should Appoint the Same Class Counsel Under Rule 23(g)

The Court has already found that "counsel for the named Plaintiffs fulfill the requirements of Rule 23(g)." Order Granting Cert. 31, ECF No. 160. Having found that Plaintiffs' counsel meets Rule 23(g)'s requirements as to the already certified class and subclass, the Court should

[24] Courts regularly find typicality satisfied where classes of prisoners bring ADA and Rehabilitation Act claims. *See*, *e.g.*, *Cole*, 2016 WL 3258345, at *8; *Hernandez*, 305 F.R.D. at 158; *Bumgarner*, 276 F.R.D. at 457. Other district courts dealing with ADA or Rehabilitation Act claims from prisoners in the Covid-19 context have similarly found typicality satisfied. *See*, *e.g.*, *Ahlman v. Barnes*, 2020 WL 2754938, at *8 (C.D. Cal. May 26, 2020).

likewise appoint Plaintiffs' current attorneys as class counsel for the Disability Subclass and the Mobility-Impaired Subclass as well.

IV. Conclusion

Plaintiffs ask that the Court modify its original certification order and certify two additional subclasses in this case: the Disability Subclass and the Mobility-Impaired Subclass, as defined above.

Dated: July 21, 2020

WINSTON & STRAWN LLP

By: */s/ John R. Keville*

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Counsel for Plaintiffs

CERTIFICATE OF CONFERENCE

I certify that the evening of July 20, 2020, I emailed Defendants' counsel regarding whether Defendants would agree to, or oppose, Plaintiffs' request to certify two additional sub-classes. Counsel did not respond to that email before Plaintiffs filed this emergency motion.

/s/ Benjamin D. Williams
Benjamin D. Williams

CERTIFICATE OF SERVICE

I certify that on July 21, 2020, a copy of this emergency supplemental motion, along with the accompanying exhibits and attachments, were served upon all counsel of record through the Court's CM/ECF filing system.

/s/ Benjamin D. Williams
Benjamin D. Williams

Exhibit A

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, Plaintiffs,	.	
VS.	.	Civil Action No. H-20-CV-1115
BRYAN COLLIER, ROBERT HERRERA, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	.	Houston, Texas July 13, 2020 P.M

TRANSCRIPT OF PROCEEDINGS (HELD REMOTELY)
BEFORE THE HONORABLE KEITH P. ELLISON
BENCH TRIAL - DAY 1 - AFTERNOON SESSION

APPEARANCES:

FOR THE PLAINTIFFS:

Mr. Brandon W. Duke
Mr. John R. Keville
Ms. Denise Scofield
Ms. Corinne Stone Hockman
Mr. Michael T. Murphy
Mr. Mark Werbner
Mr. Robert Lawrence Green, III
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mind and if Your Honor is okay, I would reserve the right to do that during his direct when we call him.

THE COURT: That's fine. That's fine.

MR. KELVIN: No objection.

01:08PM THE COURT: Let's proceed with Mr. Valentine, please.

MR. MEDLOCK: All right. Are you ready, Mr. Valentine?

THE WITNESS: Yes, sir.

BY MR. MEDLOCK:

Q. Mr. Valentine, just for the record, did someone from the prison tell you it's okay to take your mask off while you testify?

A. Yes, sir.

Q. Let's get started.

How old are you, sir?

A. I'm 69 years old.

Q. Are you a prisoner at the Pack Unit, sir?

A. Yes, I am.

Q. How long have you been in prison there?

A. Since the 8th of January, 2014.

Q. Sir, do you have any chronic medical conditions?

A. Yes, I do.

Q. Can you tell the Court what those are, please?

A. Well, I have fusion of L4/L5/S1 with instrumentation and I have fusion of the C7/C6 and I have drop foot postsurgical in the lower left leg.

In the upper left extremity, I have atrophy and weakness. I've had a stroke and I've had a deep vein thrombosis postsurgical and I have high blood pressure, hypertension, and the stroke compounding quite a bit the nerve damage in the upper left and lower left.

Q. And would you describe how the nerve damage in your upper left and lower left, as you put it, affects you?

A. Well, the upper left atrophied my hand quite a bit and the fingers don't close. I can get the thumb and the index together fairly good, but the rest of them shake and tremor quite a bit. It's weak. I have a lot of weakness in my upper body; and in my lower left, it's sometimes pain in the leg, but weakness and the drop foot.

And then on the deep vein thrombosis, I wear TED hoses for it for circulation because I have circulation problems. On the drop foot I wear ankle foot orthosis.

Q. And do you also have high blood pressure?

A. Yes, I do.

Q. Do you take medication for that condition?

A. Yes, sir, I do.

Q. What happens if you don't take your blood pressure medication?

A. Well, I get a -- I started feeling rather bad. It's like a -- it's kind of hard to describe. It's like a flushed feeling or that my temperature is rising. I can feel it around

the neck and the back part of the head and I get -- I'm sure I get some anxiety from it, but I stay regimented fairly well on my medication.

Q. Do you use any mobility aids, sir?

01:11PM A. Yes, sir. I use a walker.

Q. And how long have you used the walker?

A. Since 1993.

Q. And how did you end up using the walker?

A. Well, postsurgical I was having problems walking

01:11PM and they -- the neurosurgeon had me scheduled for a Knee Ankle Foot Orthosis, which is called a KAFO. After extensive therapy, I was able to go to the AFO, but a walker was required at that time.

I was having problems both with the drop foot then as well

01:12PM as the ability to grip with my left hand, so the walker was improvised and a larger left-hand grip was prepared by the people at Wilford Hall Medical Center in the brace and limb.

Q. And what did you do for a living before you had these surgical procedures?

01:12PM A. I was in the United States Air Force and subsequently retired from there.

Q. And were you honorably discharged?

A. Yes, sir.

Q. And what dorm are you currently living at at the Pack

01:12PM Unit?

REPORTER'S CERTIFICATE

I, Lanie M. Smith, CSR, RMR, CRR, Official Court Reporter, United States District Court, Southern District of Texas, do hereby certify that the foregoing is a true and correct transcript, to the best of my ability and understanding, from the record of the proceedings in the above-entitled and numbered matter.

/s/ Lanie M. Smith
Official Court Reporter

Exhibit B

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, Plaintiffs,	.	
VS.	.	Civil Action No. H-20-CV-1115
BRYAN COLLIER, ROBERT HERRERA, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	.	Houston, Texas July 14, 2020 9:05 a.m.

TRANSCRIPT OF PROCEEDINGS (HELD REMOTELY)

BEFORE THE HONORABLE KEITH P. ELLISON

BENCH TRIAL - **DAY 2** - MORNING SESSION

APPEARANCES:

FOR THE PLAINTIFFS:

Mr. John R. Keville
Mr. Brandon W. Duke
Ms. Denise Scofield
Ms. Corinne Stone Hockman
Mr. Michael T. Murphy
Mr. Rob Green
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PROCEEDINGS RECORDED BY STENOGRAPHIC MEANS REMOTELY,
TRANSCRIPT PRODUCED FROM COMPUTER-AIDED TRANSCRIPTION

THE COURT: Ms. Vasquez, is that agreeable?
MS. VASQUEZ: I'm sorry. Yes, your Honor.
THE COURT: Okay, thank you.
The exhibit is admitted without objection.
09:11:27 MS. VASQUEZ: Your Honor, I just heard there is a technical issue at the Pack Unit. It might be ten or fifteen minutes before they can get Mr. King on.
THE COURT: Okay. I'm going to step off the bench, then.
09:13:59 (Court recessed at 9:12 a.m.)
(Court resumed at 9:15 a.m.)
THE COURT: Okay, let's proceed.
Mr. King, if you'll be sworn.
If you'd raise your right hand, please, sir.
09:15:32 Art.
(The witness, **RICHARD ELVIN KING**, called on behalf of the Plaintiff, was sworn.)
THE COURT: Okay, let's proceed.

DIRECT EXAMINATION

09:15:45 BY MR. MEDLOCK:
Q Would you please state your name for the record, sir.
A Richard Elvin King.
Q And how old are you, Mr. King?
A Seventy-three.
09:15:53 **Q** And, sir, what did you do for a living before you were sent

A Yes, I am.
Q And how long have you been imprisoned at the Pack Unit?
A Since July of 2011.
Q So, about nine years?
09:17:33 **A** Yes.
Q Okay. Do you have any chronic medical conditions, Mr. King?
A Yes. I have diabetes, high blood pressure; and they're telling me now I got chronic kidney failure.
09:17:51 **Q** What happens if you have trouble regulating your blood sugar as a diabetic?
A Well, if you get your low blood sugar, you -- well, you pass out. You don't really know where you're at. And high blood sugar, you don't really know it until it's already, you
09:18:18 know, took it effects up on you.
Q And have you had any difficulty regulating your diabetes recently?
A Yeah. A couple, three weeks ago, I had an episode of low sugar while I was asleep.
09:18:34 **Q** And what happened?
A I didn't know anything about it, but I woke up in the infirmary.
Q And do you have any suspicion as to why you had difficulty regulating your sugar three weeks ago?
09:18:49 MS. VASQUEZ: Objection. Calls for a medical opinion.

rails on his wheelchair.

THE COURT: I think further clarification would be helpful to me. I'm going to allow it.

THE WITNESS: The wheelchair rings on my wheelchair, I have to touch those. And it is, obviously, connected to the wheels. So, sometimes my hands touch the tires that are attached to the wheel. And the rings are a definite. I have to touch those, as well.

BY MR. RUDLOFF:

11:47:47 **Q** Does anything get on your hands and really as a result of touching your -- the wheels and rim to get back to your cubicle?

MR. MOLINA: Objection, your Honor.

THE WITNESS: Yes, sir.

MR. MOLINA: Misstates the witness's testimony. He said he touches the wheels sometimes and the rails, not the rim.

THE COURT: Would you rephrase the question.

MR. RUDLOFF: Yes.

BY MR. RUDLOFF:

Q Does anything get on your hands as a result of wheeling yourself back to your cubicle?

A Yes, sir. When I traverse --

THE COURT REPORTER: I'm sorry. Mr. Jones, I'm sorry. Could you repeat that. You were breaking up.

THE WITNESS: Yes, sir. I'm sorry. The wheelchair rings or rims all -- they're all attached. They're -- it's an

inch -- it's like an inch space between the ring and the tire itself. And so, when we grab hold to the wheelchair ring, then the meaty portion of the hand touches the tire, as well.

So, anytime we grab ahold to the wheelchair rings or the wheels, for that matter, we touch anything that is on it.

11:48:48

So, if we roll onto water, then that portion of the wheel is also wet from water splashing up onto the wheel or the tire. And, also, if it's just dirt, for that matter, we get it on our hands, as well.

11:49:04

BY MR. RUDLOFF:

Q What types of things, in your experience, are on the floor in your dorm that get on your hands as you wheel back to your cubicle?

A We have constant traffic with, at most times, 30 wheelchairs. And so, 30 wheelchairs do go to the bathroom in a day's time. So, anything that is on the floor. Sometime where people shower, there are traces of feces that come out of the shower from someone who had an accident.

11:49:18

We also have a guy who has a colostomy bag. And sometimes, when he takes a shower, he doesn't have the bag on; and sometimes the feces come -- traces of feces come out of his body onto the floor. And because of the way the floor is constructed in the shower, the water from the shower flows off into the center of the bathroom floor, as well.

11:49:34

So, there is also urine traces, as well. So,

11:49:51

anything that is on that floor that we traverse through, it gets on our wheels and eventually get on our hands, as well.

And then, also driving through the dorm itself, we pick up dirt from the wheel, as well. So, you know, from the floor as well on the wheels. So, we touch that; and it gets on our hands, as well, also.

Q Are you able to wash your hands in your cubicle?

A No, sir.

Q Where do you eat your meals?

A In my cubicle.

Q Where do you prepare any food that's not provided by the Pack Unit?

A In my cubicle.

Q Do you believe hand sanitizer would help you keep your hands clean in your cubicle?

A Yes, sir.

Q I'm going to talk a little bit about showering.

Where do you shower in your dorm?

A In the shower.

Q Do you use the main bathroom shower -- excuse me.

MR. RUDLOFF: Strike that.

BY MR. RUDLOFF:

Q Do you use the main shower in the building?

A No, sir. Just the one in my dorm.

Q Approximately, what percentage of the inmates that use that

(Court recessed at 12:01 p.m.)

C E R T I F I C A T E

I certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter, to the best of my ability.

This record was taken through video or telephone conference which may have affected the quality of the record.

By: /s/*Gayle L. Dye* *07-14-2020*

Gayle L. Dye, CSR, RDR, CRR Date

Exhibit C

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, Plaintiffs,	.	
VS.	.	Civil Action No. H-20-CV-1115
BRYAN COLLIER, ROBERT HERRERA, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	.	Houston, Texas July 15, 2020 9:13 a.m.

TRANSCRIPT OF PROCEEDINGS (HELD REMOTELY)

BEFORE THE HONORABLE KEITH P. ELLISON

BENCH TRIAL - **DAY 3** - MORNING SESSION

APPEARANCES:

FOR THE PLAINTIFFS:

Mr. John R. Keville
Mr. Brandon W. Duke
Ms. Denise Scofield
Ms. Corinne Stone Hockman
Mr. Michael T. Murphy
Mr. Rob Green
Mr. Mark Werbner
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PROCEEDINGS RECORDED BY STENOGRAPHIC MEANS REMOTELY,
TRANSCRIPT PRODUCED FROM COMPUTER-AIDED TRANSCRIPTION

had died at the Luther Unit as compared to the 19 that have died under your charge?

MR. COWLES: Objection. Ambiguous. Time frame.

THE COURT: Overruled.

11:31:10 THE WITNESS: Repeat the question, please.

BY MR. KEVILLE:

Q You didn't think it important to ask the warden at the Luther Unit how many men have died under your command in view of the 19 you've had at the Pack Unit?

11:31:21 MR. COWLES: Same objection.

THE COURT: Overruled.

THE WITNESS: The 19 deaths did not occur at the Pack Unit, sir.

BY MR. KEVILLE:

11:31:29 **Q** How many deaths -- oh, you're saying they didn't actually die while they were in the Pack Unit. Some of them died when they went to the hospital?

A None of them have died on the Pack Unit.

Q Sure. But you understand 19 of the men at the Pack Unit

11:31:43 have died and been positive for COVID-19?

MR. COWLES: Objection. Ambiguous.

THE COURT: Overruled.

THE WITNESS: I agree.

BY MR. KEVILLE:

11:31:53 **Q** Okay. And so, in view of that, you didn't think it was

with the Court.

MR. KEVILLE: Your Honor, I've just checked. That is correct when it was filed with the Court in opposition to the motion. But it was also produced in this case, and it was not designated under the protective order in this case, so --

11:54:14

MR. COWLES: I mean, I thought I saw an "attorneys' eyes only"; but Counsel, I'm happy to explore that over the lunch break if you wanted to keep moving on. Or if you want to do it now, that's fine with me, too.

11:54:30

THE COURT: That's fine with me. If you want to break now and talk about it, that's fine. Or if you want to keep going on to something else, that's fine, too.

MR. KEVILLE: You know what? It's noon. Why don't we take our lunch break here, your Honor.

11:54:46

THE COURT: Okay. 45 minutes. Thank you.

(Court recessed at 11:55 a.m.)

C E R T I F I C A T E

I certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter, to the best of my ability.

This record was taken through video or telephone conference which may have affected the quality of the record.

By: /s/*Gayle L Dye* *07-15-2020*
Gayle L. Dye, CSR, RDR, CRR Date

Exhibit D

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, Plaintiffs,	.	
VS.	.	Civil Action No. H-20-CV-1115
BRYAN COLLIER, ROBERT HERRERA, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	.	Houston, Texas July 16, 2020 P.M

TRANSCRIPT OF PROCEEDINGS (HELD REMOTELY)
INCLUDING PORTIONS UNDER SEAL
BEFORE THE HONORABLE KEITH P. ELLISON
BENCH TRIAL - DAY 4 - AFTERNOON SESSION

APPEARANCES:

FOR THE PLAINTIFFS:

Mr. Brandon W. Duke
Mr. John R. Keville
Ms. Denise Scofield
Ms. Corinne Stone Hockman
Mr. Michael T. Murphy
Mr. Mark Werbner
Mr. Robert Lawrence Green, III
Mr. Kyle A. Terao
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again. It's another improper and incompetent expert opinion on security issues.

THE COURT: Overruled.

BY MS. HOCKMAN:

03:39PM Q. Now, you heard several inmates testify that they are in wheelchairs or use walkers; is that right?

A. That's right.

Q. How does this virus spread from one person to another?

A. Typically we think of respiratory droplets. So when

03:39PM people speak or cough or sneeze, the virus particles are in the respiratory droplets. Usually those don't travel more than 6 feet. Sometimes, if somebody coughs or sneezes or sings loudly, it will travel further; but typically we think of respiratory droplets dropping to the floor before 6 feet.

03:39PM It can also spread by what we call fomites, which are just inanimate objects that people can touch or cough or sneeze on and we know that the virus can be viable for a couple of days, at least on fomites.

Q. So you just mentioned that the respiratory droplets will

03:40PM fall on to the floor. Do they stay viable on the floor for a period of time?

A. Yes.

Q. And so if the inmates are in wheelchairs, is it possible for them to get virus on their hands if they touch the wheels

03:40PM of their wheelchair, which contacts the floor?

MR. COWLES: Objection. Calls for speculation. Incomplete hypothetical.

THE COURT: Overruled.

A. That would be possible.

03:40PM **BY MS. HOCKMAN:**

Q. So when these individuals are rolling back to their cubicles from sinks after they wash their hands and they contact the wheels as they're wheeling back, what's the state of their hands when they return to their cubicles?

03:40PM MR. COWLES: Objection. Calls for speculation. Lacks foundation.

THE COURT: Overruled.

A. They've been contaminated by the wheels, which have been on the floor.

03:41PM **BY MS. HOCKMAN:**

Q. And you said before that it's possible for the virus to live on the floor?

A. Yes, absolutely.

Q. All right. I have just two more questions about hand

03:41PM hygiene.

So Number 1, is it your medical opinion that unrestricted access to hand soap and controlled access to an alcohol-based hand sanitizer are medically necessary to control the outbreak of COVID-19 that the Pack Unit is currently experiencing?

03:41PM MR. COWLES: Objection, Your Honor. Incompetent expert

REPORTER'S CERTIFICATE

I, Lanie M. Smith, CSR, RMR, CRR, Official Court Reporter, United States District Court, Southern District of Texas, do hereby certify that the foregoing is a true and correct transcript, to the best of my ability and understanding, from the record of the proceedings in the above-entitled and numbered matter.

/s/ Lanie M. Smith
Official Court Reporter

Exhibit E

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, Plaintiffs,	.	
VS.	.	Civil Action No. H-20-CV-1115
BRYAN COLLIER, ROBERT HERRERA, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	.	Houston, Texas July 20, 2020 9:13 a.m.

TRANSCRIPT OF PROCEEDINGS (HELD REMOTELY)

BEFORE THE HONORABLE KEITH P. ELLISON

BENCH TRIAL - **DAY 6** - MORNING SESSION

APPEARANCES:

FOR THE PLAINTIFFS:

Mr. John R. Keville
Mr. Brandon W. Duke
Ms. Denise Scofield
Ms. Corinne Stone Hockman
Mr. Michael T. Murphy
Mr. Rob Green
Mr. Mark Werbner
Mr. Kyle Terao
Mr. Jason Patrick Rudloff
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PROCEEDINGS RECORDED BY STENOGRAPHIC MEANS REMOTELY,
TRANSCRIPT PRODUCED FROM COMPUTER-AIDED TRANSCRIPTION

Q You've reviewed depositions of the inmates?

THE COURT REPORTER: I'm sorry. There was some interference. I didn't get the witness's answer.

MR. EDWARDS: Okay. I'll re-ask the question.

11:09:35 BY MR. EDWARDS:

Q You've reviewed documents that were produced by the Texas Department of Criminal Justice; is that correct?

A That is correct.

Q Okay. And you've reviewed depositions from the inmates who

11:09:45 have testified in this case?

A Yes. I read them all.

Q Okay. And have you also listened to the testimony from the inmates and the other witnesses in this case?

A With the exception of breakout for the chat rooms, I have

11:10:01 been dialed into the hearing since it began, yes.

Q So, is it fair to say that you've listened to almost all of the testimony in this case?

A That's correct.

Q Okay. And as a consequence, you're aware of the numbers of

11:10:22 positive tested inmates and hospitalizations and deaths at the Pack Unit?

A I'm not real clear on hospitalizations, but I am aware that there's been nearly around 500 positives and 19 associated deaths.

11:10:39 **Q** Now, you mentioned that you've seen the Pack Unit in

standpoint that the policies and practices in place at the Pack Unit are a danger to the Pack inmates and, frankly, staff?

A I believe that they are, yes.

Q Would you tell the -- tell the Court generally, you know, without getting too much into specifics why you hold that opinion, sir.

11:14:08

A Well, one of the things that is surprising to me in this case is in some ways the similarity to the heat litigation. It was really clear in my work on that case of the comorbidities that exist. And I already talked about just the visual look at the population.

11:14:28

This is a very vulnerable population to COVID-19. And in my opinion, Texas has not done what they need to do to respond to the risk of the virus within this vulnerable population.

11:14:51

From my areas, I think that that relates to a couple of different --

THE COURT REPORTER: I'm sorry. There was more interference.

11:15:02

THE WITNESS: I'm sorry about that.

From my perspective, I think my concerns fall into two broad categories. One of those is cleanliness. In my experience, I don't think they're doing near enough to keep that facility clean; and that's one of risk factors for contracting the virus.

11:15:21

THE WITNESS: I have not seen evidence to that effect.
BY MR. EDWARDS:
Q Okay. Again, do you -- do you find that dangerous to the men at the Pack Unit?
11:31:15 **A** I'm sorry. Again?
Q I apologize.
Do you find that dangerous or potentially dangerous to the men at the Pack Unit who are housed there?
MS. VASQUEZ: Objection. Incomplete hypothetical.
11:31:27 THE COURT: Overruled.
THE WITNESS: Yes, I do.
BY MR. EDWARDS:
Q Now, again, there is an argument that is being advanced by Texas Department of Criminal Justice that there are security
11:31:42 issues with regard to the hand sanitizer. And we've dealt with that globally.
If the Court were to conclude that there are some security aspects that -- that would preclude hand sanitizer for all of the inmates, as Dr. Young recommends, do you have any
11:32:03 recommendations for the Court as to certain types of inmates that absolutely need it? And if you do, would you explain why.
A Well, I think we know from the history of this -- of this virus that it can be transmitted through touch. And so, the issue for me is can the prisoners wash their hands, get their
11:32:33 hands clean? And it's clear that sometimes they can with soap

and water. But it's equally clear that there may be -- there are areas in the facility where that's difficult.

So one of those areas that I think that's clearly been identified where there needs to be something that allows the -- allows the prisoners to clean their hands is at that laundry exchange.

11:32:56

I also think there's probably other areas, especially, around inmate work assignments, that there needs to be an analysis to figure out if this person -- does this prisoner in this job have access to the ability to clean their hands. And if there's not a sink with an access to soap, then they probably need access to hand sanitizer, too.

11:33:13

The second category, though, are those prisoners who are mobility-impaired. And I think it's very clear from the trial testimony and the depositions -- the trial testimony and the depositions that it is difficult, if not impossible, for some of those mobility-impaired people to keep their hands clean.

11:33:33

Q Have you seen any sort of documentary evidence or, frankly, testimony from TDCJ that they're considering whether or not to give the mobility-challenged hand sanitizer?

11:33:54

A No, I have not. But I want to add something to that. And I think it was in Mr. Collier's trial testimony. He said that would be a medical decision. But given the fact that hand sanitizer is not authorized by the policy that was put together

11:34:21

C E R T I F I C A T E

I certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter, to the best of my ability.

This record was taken through video or telephone conference which may have affected the quality of the record.

By: /s/*Gayle L. Dye* *07-20-2020*

Gayle L. Dye, CSR, RDR, CRR Date

Exhibit F

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, Plaintiffs,	.	
VS.	.	Civil Action No. H-20-CV-1115
BRYAN COLLIER, ROBERT HERRERA, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	.	Houston, Texas July 20, 2020 P.M

TRANSCRIPT OF PROCEEDINGS (HELD REMOTELY)
BEFORE THE HONORABLE KEITH P. ELLISON
BENCH TRIAL - DAY 6 - AFTERNOON SESSION

APPEARANCES:

FOR THE PLAINTIFFS:

Mr. Brandon W. Duke
Mr. John R. Keville
Ms. Denise Scofield
Ms. Corinne Stone Hockman
Mr. Michael T. Murphy
Mr. Mark Werbner
Mr. Robert Lawrence Green, III
Mr. Kyle A. Terao
Mr. Jason P. Rudloff
WINSTON & STRAWN, LLP
800 Capitol Street
Suite 2400
Houston, Texas 77002
713.651.2600
FAX: 713.651.2700
bduke@winston.com
jkeville@winston.com

THE COURT: Overruled.

A. Yes, I agree they have a disability.

BY MR. EDWARDS:

Q. And you know that there are more than 40 or 50 or 60 inmates in wheelchairs at the Pack Unit, right?

04:01PM

MR. MOLINA: Objection, Your Honor. Vague.

THE COURT: I'll allow it. Overruled.

MR. COWLES: I'm aware of that. Yes, sir.

BY MR. EDWARDS:

Q. Let me ask you just straight up: Don't you think it would be reasonable for the administration at Pack to provide hand sanitizer to the people with mobility disabilities assuming that y'all care about protecting the inmates as much as you can from the dangers of COVID-19?

04:02PM

MR. MOLINA: Objection, Your Honor. Argumentative and asked and answered. He's already explained the security risks of hand sanitizer.

THE COURT: I think we've already talked about this. Let's move on.

BY MR. EDWARDS:

Q. Do you agree that your job, in addition to following 14.52, is to follow the Constitution?

MR. MOLINA: Objection. Vague.

THE COURT: Yeah. That's a legal question.

04:02PM

BY MR. EDWARDS:

REPORTER'S CERTIFICATE

I, Lanie M. Smith, CSR, RMR, CRR, Official Court Reporter, United States District Court, Southern District of Texas, do hereby certify that the foregoing is a true and correct transcript, to the best of my ability and understanding, from the record of the proceedings in the above-entitled and numbered matter.

/s/ Lanie M. Smith
Official Court Reporter

Exhibit G

Filed Under Seal

Exhibit H

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated, Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-01115
BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, And TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	§	

DEFENDANTS' THIRD SUPPLEMENTAL RESPONSE TO PLAINTIFFS' FIRST SET OF INTERROGATORIES (NOS. 1–8)

TO: Plaintiffs Laddy Valentine and Richard King through their attorney of record, John R. Keville, Winston & Strawn, LLP, 800 Capital Street, Suite 2400, Houston, TX 77002, *jkeville@winston.com.*

Come now Defendants Bryan Collier, Richard Herrera and the Texas Department of Criminal Justice ("TDCJ") pursuant to Federal Rule of Civil Procedure 33, and hereby submit this third supplemental response to Plaintiffs Valentine and King's First Set of Interrogatories (Nos. 1-8).

Respectfully Submitted,

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

RYAN L. BANGERT
Deputy First Assistant Attorney General

DARREN L. MCCARTY
Deputy Attorney General for Civil Litigation

SHANNA E. MOLINARE
Assistant Attorney General
Chief, Law Enforcement Defense Division

/s/ Christin Cobe Vasquez
CHRISTIN COBE VASQUEZ
Assistant Attorney General
Law Enforcement Defense Division
Texas State Bar No. 24074047

OFFICE OF THE ATTORNEY GENERAL
P.O Box 12548, Capitol Station
Austin, Texas 78711
(512)475-4199 / (512)370-9996 (fax)

COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I, **CHRISTIN COBE VASQUEZ**, certify that a true copy of the foregoing was served on July 4, 2020 via email, addressed as follows:

John R. Keville
Winston & Strawn, LLP
800 Capital Street, Suite 2400
Houston, TX 77002
jkeville@winston.com

Jeff Edwards
The Edwards Law Firm
The Haehnel Building
1101 East 11th Street
Austin, TX 78702
jeff@edwards-law.com
Attorneys for Plaintiffs

/s/ Christin Cobe Vasquez
CHRISTIN COBE VASQUEZ
Assistant Attorney General

DEFENDANTS' THIRD SUPPLEMENTAL RESPONSE TO PLAINTIFFS' FIRST SET OF INTERROGATORIES (NOS. 1–8)

INTERROGATORY NO. 1:

Identify every inmate housed at the Pack Unit as of April 1, 2020 who has been tested for COVID-19. For each inmate, provide their name, identification number, housing assignment on the date of the test, reason they were selected for testing, result of the test, and indicate if the test was ordered by a medical provider or for some other reason. This request specifically includes the identity of the "second inmate" who tested positive for COVID-19 at the Pack Unit, as reported by the Grimes County Office of Emergency Management. *See* https://www.grimescountytexas.gov/page/open/2341/0/Grimes%20County%20Pack%20Unit%2 0Cases%20Press%20Release.pdf.

Answer: Subject to and without waiving the following objections, and pursuant to Rule 33(d), the information requested can be found in the letter filed with the United States Court of Appeals for the Fifth Circuit on May 11, 2020. Further responsive information can be found in the spreadsheet of Pack Unit offenders tested for COVID-19 as of May 14, 2020 (previously disclosed bates stamped documents 1319 – 1324); Pack Unit offender testing results as of May 19, 2020 (previously disclosed bates stamped documents 1674 – 1685), Pack Unit offender source contract tracing for offenders with the last name O to Z (previously disclosed bates stamped documents 1686 – 1699 (attorneys' eyes only), and Pack Unit employee source contract tracing (previously disclosed bates stamped documents 1700 – 1715 (attorneys' eyes only), Pack Unit offender testing from March 1, 2020, to June 1, 2020 (bates stamped documents 2506 – 2554 (designated attorneys' eyes only)). Defendants object that this request is overbroad, irrelevant, is not reasonably limited in time, and amounts to an impermissible fishing expedition by Plaintiffs. Will supplement if and when further responsive information is identified.

INTERROGATORY NO. 2:

Identify any instances in the previous two years where Defendants responded to a Step 1 grievance at the Pack Unit before the 40-day deadline expired. A response to this interrogatory should identify the inmate who filed the grievance, the general subject matter of the grievance, the general subject matter of the response, indicate when the grievance was signed by the inmate, indicate when the grievance was stamped "received" by TDCJ, indicate the date of the response, and indicate whether the grievance was returned to the inmate to "resubmit" due to a purported procedural flaw (as identified on the back of the grievance form).

Answer: Subject to and without waiving the following objections, and pursuant to Rule 33(d), see the spreadsheet of Pack Unit offender grievances (bates stamped 2278 - 2337); Appendix D from the Offender Grievance Operations Manual (bates stamped documents 2338-2347); as well as spreadsheet entitled Interrogatories 2 & 3 Update (bates stamped 11566-11568). Defendants object that this request is overbroad, irrelevant, not reasonably limited in time or scope, overly burdensome, harassing, and constitutes an impermissible fishing expedition by Plaintiffs.

INTERROGATORY NO. 3:

Identify any instances in the previous two years where Defendants responded to a Step 2 grievance at the Pack Unit before the 40-day deadline expired. A response to this interrogatory should identify the inmate who filed the grievance, the general subject matter of the grievance, the general subject matter of the response, indicate when the grievance was signed by the inmate, indicate when the grievance was stamped "received" by TDCJ, indicate the date of the response, and indicate whether the grievance was returned to the inmate to "resubmit" due to a purported procedural flaw (as identified on the back of the grievance form).

Answer: Subject to and without waiving the following objections, and pursuant to Rule 33(d), see the spreadsheet of Pack Unit offender grievances (bates stamped documents 2278 - 2337), Appendix D from the Offender Grievance Operations Manual (bates stamped documents 2338 - 2347); as well as spreadsheet entitled Interrogatories 2 & 3 Update (bates stamped 11566-11568). Defendants object that this request is overbroad, irrelevant, not reasonably limited in time or scope, overly burdensome, and constitutes an impermissible fishing expedition by Plaintiffs.

INTERROGATORY NO. 4:

Identify all grievances filed between March 31, 2018 and April 1, 2020 at the Pack Unit that addressed any of the below topics. A response to this interrogatory should include the name of the inmate submitting the grievance (and their inmate number), the date the grievance was "received" by TDCJ, and the date TDCJ responded to the grievance.

A. The novel coronavirus (aka COVID-19);

B. Hand sanitizer;

C. Cleaning supplies;

D. Soap;

E. Hand towels;

F. Facial tissues

G. Face masks;

H. Cleanliness of the prison; and,

I. Health care co-pays.

Answer: Subject to and without waiving the following objections, and pursuant to Fed. R.

Civ. P. 33(d), see the Pack Unit offender grievances pertaining to TDCJ procedures regarding the above topics, dated May 1, 2020 (previously disclosed bates stamped documents 0801-1318); see also spreadsheet of Pack Unit offender grievances regarding the above topics (bates stamped documents 2348 – 2357). Defendants object that this request is overbroad, irrelevant, not reasonably limited in time, overly burdensome, harassing, and constitutes an impermissible fishing expedition by Plaintiffs.

INTERROGATORY NO. 5:

Identify the name and inmate identification number of each inmate at the Pack Unit with any of the following health conditions.

a. Over the age of 65;

b. Asthma;

c. Body-mass index at or over 40;

d. Cystic Fibrosis;

e. Congestive Heart Failure;

f. Chronic obstructive pulmonary disorder (COPD);

g. Cirrhosis;

h. Diabetes;

i. Uncontrolled Hypertension;

j. HIV or AIDS;

k. Chronic lung disease;

l. Immune deficiencies;

m. Prolonged use of corticosteroids;

n. Chronic kidney disease (or regularly undergo dialysis);

o. Liver disease.

Answer (for subparts i, k, l, o): Defendants object to the requested information for uncontrolled hypertension; chronic lung disease; immune deficiencies; and liver disease on the grounds that the requested information is vague, ambiguous and overbroad.

Answer (for subparts a – h, j, m[1], and n): Subject to and without waiving the following objections, and pursuant to Fed. R. Civ. P., Rule 33(d), see bates stamped documents 2446 – 2458 (designated attorneys' eyes only). Defendants object that this request is overly burdensome, vague, overbroad, and an impermissible fishing expedition.

INTERROGATORY NO. 6:

Identify all TDCJ employees or contractors who have communicated with any representative of the Centers for Disease Control regarding COVID-19. This request calls for the name of the TDCJ employee (or contractor), the TDCJ employee (or contractor)'s job title, the identity of the CDC representative they spoke to, the date of the communication, and a summary of the substance of the communication.

Answer: Subject to and without waiving the following objections, none at this time. Defendants will supplement if relevant information becomes available. Defendants object that this request is overly burdensome and not reasonably limited in time or scope. Further, Defendants object that the terms "regarding COVID-19" are vague and it is therefore unclear what information the Plaintiffs seek.

INTERROGATORY NO. 7:

If you contend that TDCJ has implemented any of the below measures at the Pack Unit, please state the date TDCJ began implementing the measure, the reason the measure was implemented on that date, and a description of how TDCJ is implementing the measure.

A. Hand sanitizer made available to inmates;

B. Additional cleaning supplies provided for inmate living areas;

C. Gloves provided to each inmate janitor;

D. Additional scheduled cleaning in inmate living areas;

E. Additional hand soap provided to inmates;

F. Hand towels provided to inmates;

G. Facial tissues (or additional toilet paper) provided to inmates;

[1] Defendants' response to subpart (m) identifies offenders who have used corticosteroids for a period of three months or longer.

H. Face masks provided to inmates;

I. Inmates were informed regarding Gov. Abbott's order suspending health care copays;

J. Suspension of accepting new inmates into the Pack Unit, whose "unit of assignment" was a prison other than the Pack Unit prior to March 13, 2020;

K. Prohibition on officers assigned to work at the Pack Unit working at other TDCJ prisons;

L. Requirement that TDCJ staff and contractors wear masks at the Pack Unit;

M. Prohibition on transportation of Pack Unit inmates to other locations, unless necessary for immediately necessary medical treatment or release from custody;

N. Social distancing;

O. Cleaning the dining hall between sittings;

P. Cleaning the showers between uses;

Q. Signage in common areas regarding COVID-19; and,

R. Education of inmates regarding COVID-19.

Answer (for subparts A-R): Defendants object that this request is overbroad and vague. Subject to and without waiving the foregoing objections, and pursuant to Fed. R. Civ. P. 33(d), see bates stamped documents 2555 – 2559.

INTERROGATORY NO. 8:

Identify every inmate who was assigned to live at the Pack Unit after March 13, 2020 who had prior to March 13, 2020 been living in another correctional facility. For each such inmate, provide their name and identification number, the date they arrived at the Pack Unit, and any correctional facility they were assigned to in the 30 days prior to their assignment to the Pack Unit.

Answer: Pursuant to Fed. R. Civ. P. 33(d), the information requested may be found in a spreadsheet detailing Pack Unit offenders' movement to and from the Pack Unit for dates between March 13, 2020, and April 30, 2020 (bates stamped documents 2358-2380). See also spreadsheet detailing Pack Unit offenders' movement to and from the Pack Unit for dates March 13, 2020 to May 22, 2020 (bates stamped documents 3553 – 3904) and spreadsheet detailing Pack Unit offenders' movement to and from the Pack Unit for dates May 26, 2020 to June 4, 2020 (bates stamped documents 3905 – 3949). In addition, see spreadsheet detailing offenders' movement from and to the Pack Unit, May 26, 2020 through June 17, 2020 (bates stamped documents 11569-11586).

Exhibit I

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE, and RICHARD ELVIN KING, Individually and on Behalf of Those Similarly Situated, Plaintiffs,	)	
vs.	)	Civil Action No.
BRYAN COLLIER, in his Official Capacity, ROBERT HERRERA, in his Official Capacity, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	)	4:20-cv-011115-KE

REMOTE ORAL DEPOSITION

AARON SMITH

Tuesday, July 7, 2020

Reported by

Rebecca Callow, RMR, CRR, RPR

Job No. AS070720

A. No. I just have high blood pressure.

Q. Other than high blood pressure, do you have any medical conditions that you receive treatment or medication for?

A. Yes, I do.

PTSD, bipolar, and high blood pressure are what I receive medications for.

Q. All right. I gotcha.

What did you do to prepare for this deposition today?

A. I talked to my attorneys about this.

Q. Did you review any documents?

A. My internet is saying "condition -- okay -- unstable."

Yes -- no. Excuse me.

Q. So you just talked to your attorneys?

A. Yes.

Q. Okay. And do you have a general understanding of what this case is about?

MR. GREEN: I just want to be clear real quick. Right before this started, I did show him the grievance form that y'all produced to us sometime earlier this morning. A grievance form that he had filed.

When he's talking about prep earlier,

REPORETER'S CERTIFICATE

I, Rebecca J. Callow, Registered Merit Reporter and Notary Public of State of Texas, hereby certify to the following.

That the witness, AARON SMITH, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the original deposition was delivered to Landon Wade.

That a copy of this certificate was served on all parties and/or the witness shown herein on July 9, 2020.

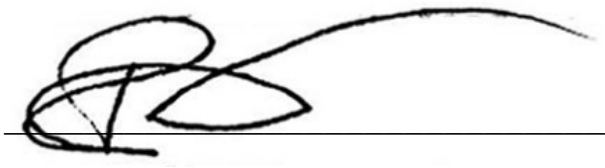
I further certify that pursuant to FRCP Rule 30(f)(1) that the signature of the deponent:

was requested by the deponent or a party before the completion of the deposition and is to be returned within 30 days from date of receipt of the transcript. If returned, the attached Changes and Signature Page contains any changes and the reasons therefor;

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys to the action in which this proceeding was taken. Further, I am not a relative

or employee of any attorney or record in this cause, nor am I financially or otherwise interested in the outcome of the action.

SUBSCRIBED AND SWORN TO under my hand and seal of office on this the 9th day of July, 2020.



Rebecca J. Callow, RMR, CRR, RPR
Notary Public, Travis County, Texas
My Commission No. 12955701-3
Expires: 09/12/2021

Exhibit J

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated, Plaintiffs,	*	
v.	*	CIVIL ACTION NO. 4:20-cv-01115
BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, And TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	*	

VIDEOCONFERENCED DEPOSITION

OF

THOMAS RAY PENNINGTON, TDCJ #531216

July 7, 2020

VIDEOCONFERENCED DEPOSITION OF THOMAS RAY PENNINGTON, TDCJ #531216, produced as a witness at the instance of the Defendants, and duly sworn, was taken in the above- styled and numbered cause on Tuesday, July 7, 2020, from 9:07 a.m. to 1:30 p.m., before Debbie D. Cunningham, CSR, in and for the State of Texas, remotely reported via Machine Shorthand, pursuant to the Federal Rules of Civil Procedure.

--ooOoo--

but I understand the English language as much as -- to my knowledge.

Q. Yes, sir. And your inability to read, is there a medical condition that prevents you?

A. To my knowledge, I think so, sir, because I can learn a word or something now; and I'll forget it by tomorrow. I won't even know I read it.

Q. Okay. Are you on any medications currently?

A. Yes, sir.

Q. Would you mind listing those off for me?

A. Well, I don't know the names of them, sir; but I know I got a bunch of them I take.

Q. Okay. Let me ask it this way: Would any of those medications prevent you from testifying fully and truthfully here today?

A. No, sir.

Q. Okay. Is there anything else that would prevent you from testifying fully and truthfully here today?

A. No, sir.

Q. I appreciate that.

Mr. Pennington, what are your current medical conditions?

A. See, I got this walker for one, sir. I got sleep apnea. I got DVTs. I got a tumor between my legs

about the size of a football. And then, my left leg I got a -- my left leg, it's about -- I got ulcers on the back of it. I got high blood pressure, diabetes. I got a whole lot of them.

Q. Okay. Have you ever been tested for the coronavirus?

A. Yes, sir.

Q. Okay. How many times?

A. Twice.

Q. Twice?

A. Yes, sir. One, TDCJ did it here on the unit. And like, later, when I went to the hospital --

Q. Okay.

A. -- they swabbed my nose; and that's when I come up positive.

Q. Okay. That first test, when it was TDCJ that did it, do you recall when that took place?

A. When they did the unit -- the first time they come over and did the unit, I don't remember the date, what date it was, no, sir; but I come up negative on that test.

Q. Okay. So I'm not asking for a specific date, but do you remember what month that took place?

A. I'm going to try to give you a good guess.

Q. Yes, sir.

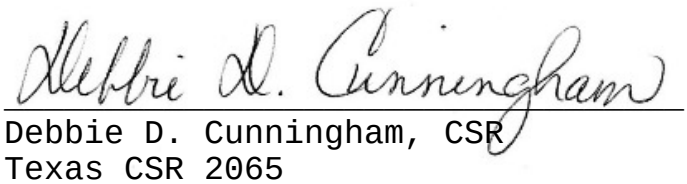
STATE OF TEXAS)

REPORTER'S CERTIFICATION

I, DEBBIE D. CUNNINGHAM, CSR, hereby certify that the witness was duly sworn and that this transcript is a true record of the testimony given by the witness.

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Subscribed and sworn to by me this day, July 8, 2020.



Debbie D. Cunningham, CSR
Texas CSR 2065
Expiration: 6/30/2021
INTEGRITY LEGAL SUPPORT SOLUTIONS
P.O. Box 245
Manchaca, Texas 78652
www.integrity-texas.com
512-320-8690; FIRM # 528

Exhibit K

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated,	)	
Plaintiffs,	)	
v.	)	C.A. NO. 4:20-CV-01115
BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE,	)	
Defendants.	)	

ORAL DEPOSITION

GARY BUTAUD

JULY 6, 2020

ORAL DEPOSITION OF GARY BUTAUD, produced as a witness at the instance of the Defendants and duly sworn, was taken in the above-styled and numbered cause on the 6th day of July, 2020, from 9:24 a.m. to 11:52 a.m., before Dana Richardson, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the TDCJ-CID Wallace Pack Unit, 2400 Wallace Pack Rd., Navasota, Texas 77868, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

fatal accident in a vehicle and was confined to a wheelchair due to extensive injuries.

Q. And do you remain in a wheelchair?

A. No, I'm not in a wheelchair now. I've worked myself out of it.

Q. Okay. Fantastic. Are there -- are there any other medical conditions that you experience while at the Pack Unit?

A. Well, I suffer from severe asthma. I suffer from hypertension. I have Hepatitis C.

Q. And is that all of the --

A. I think that --

Q. Is that all of your medical conditions?

A. -- that's it. Yes, sir.

Q. Okay. Before we kind of get into the Pack Unit as it exists today during COVID-19, I want to talk a little bit about your experiences at the unit prior to the onset of -- of COVID-19 here in early 2020. Did you -- you know, I -- I understand that you probably don't enjoy being at the Pack Unit, but it sounded like you've been at a lot of different units in the past. Is there anything about the Pack Unit that you like or enjoy?

A. No.

Q. Okay. Is -- in terms of normal life prior to

STATE OF TEXAS
COUNTY OF HARRIS

REPORTER'S CERTIFICATE

I, Dana Richardson, a Certified Shorthand Reporter in and for the State of Texas, do certify that this deposition transcript is a true record of the testimony given by the witness named herein, after said witness was duly sworn by me. The witness was not requested to review the deposition.

I further certify that I am neither attorney or counsel for, related to, nor employed by any parties to the action in which this testimony is taken and, further, that I am not a relative or employee of any counsel employed by the parties hereto or financially interested in the action.

I further certify that the amount of time used by each party at the deposition is as follows:

Mr. Ralph Molina - 01:47

SUBSCRIBED AND SWORN TO under my hand and seal of office on this the 7th day of July, 2020.

Dana Richardson, RPR, TX CSR 5386
Expiration: 01/31/22
Integrity Legal Support Solutions
Firm Registration No. 528
PO Box 245
Manchaca, Texas 78652
(512) 320-8690
(512) 320-8692 (fax)

Exhibit L

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

LADDY CURTIS VALENTINE, and RICHARD ELVIN KING, Individually and on Behalf of Those Similarly Situated, Plaintiffs,	)	
vs.	)	Civil Action No.
BRYAN COLLIER, in his Official Capacity, ROBERT HERRERA, in his Official Capacity, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	)	4:20-cv-011115-KE

REMOTE ORAL DEPOSITION

ROGER BEAL

Tuesday, July 7, 2020

Reported by

Rebecca Callow, RMR, CRR, RPR

Job No. RB070720

conditioning. There we go.

Q. Okay.

A. Yes.

Q. They were doing construction to get the air conditioning installed?

A. Yes, sir. Yeah.

Q. Do you have any current medical conditions, Mr. Beal?

A. Yes.

Q. What are those?

A. I've got some cardio issues. I've got a lot of neurological issues. I've had two major surgeries on my neck, one major surgery on my lumbar spine. I've had two hip replacements on my left hip. I had most of my gallbladder removed. It's pretty much it for in TDC.

Q. And have you been receiving care for those conditions at the Pack Unit?

A. Yes.

Q. Were all of those procedures that you just mentioned, did those all take place while you were at the Pack Unit?

A. Not all of them, no. I've had two -- my two surgical spine surgeries while I was at Pack 1, yes.

Q. You said you have a cardiac condition. Is that right?

A. Yes.

Q. What is that specifically?

A. They're still trying to find out, actually. I'm waiting to have a third stress test to find out what's going on with that. So I can't really say any more on that.

Q. Okay. Fair enough.

Do you have a chronic lung disease or severe asthma?

A. No.

Q. Are you immunocompromised?

A. What was that?

Q. Are you immunocompromised? Any immune system deficiencies?

A. No.

Q. Are you undergoing cancer treatment?

A. No, sir.

Q. Do you have diabetes?

A. No.

Q. Renal failure?

A. No.

Q. Liver disease?

A. No.

REPORTER'S CERTIFICATE

I, Rebecca J. Callow, Registered Merit Reporter and Notary Public of State of Texas, hereby certify to the following.

That the witness, ROGER BEAL, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the original deposition was delivered to Landon Wade.

That a copy of this certificate was served on all parties and/or the witness shown herein on July 9, 2020.

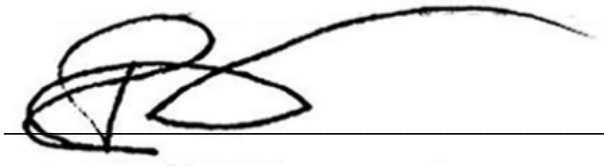
I further certify that pursuant to FRCP Rule 30(f)(1) that the signature of the deponent:

was requested by the deponent or a party before the completion of the deposition and is to be returned within 30 days from date of receipt of the transcript. If returned, the attached Changes and Signature Page contains any changes and the reasons therefor;

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys to the action in which this proceeding was taken. Further, I am not a relative

or employee of any attorney or record in this cause, nor am I financially or otherwise interested in the outcome of the action.

SUBSCRIBED AND SWORN TO under my hand and seal of office on this the 9th day of July, 2020.



Rebecca J. Callow, RMR, CRR, RPR
Notary Public, Travis County, Texas
My Commission No. 12955701-3
Expires: 09/12/2021

Exhibit M

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated, Plaintiffs, v. BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	Case No. 4:20-cv-01115 Honorable Keith P. Ellison

REMOTE VIDEO-RECORDED DEPOSITION OF

ROBERT HERRERA

VOLUME 1

Tuesday, May 19, 2020

Reported by Susan Perry Miller,

CSR-TX, CCR-LA, CSR-CA-13648

NCRA RDR, CRR, CRC

A. You know, there's some things that we have done.
BY MR. EDWARDS:
Q. All right. Let me ask it this way. You're relying on 14.52 to guide you through the process, right?
A. I rely on 14.52 to give me some kind of guidance and refer back to it, yes.
Q. Okay. Have you devised any plan, anything in writing, that is particular to the Pack Unit, you know, that has been adapted from the 14.52 policy or the COVID-19 correctional and facility guidelines from the CDC?
A. I have not.
Q. Okay.
MR. EDWARDS: We'll take a break now for about -- what do you need, five minutes, guys?
MS. VASQUEZ: 10 would be good.
MR. EDWARDS: 10's fine.
(Recess taken, 2:25 p.m. to 2:44 p.m. CDT)
THE VIDEOGRAPHER: Okay, stand by, please. The time is 2:44. On the record.
--oOo--

REPORTER'S CERTIFICATION

I, SUSAN PERRY MILLER, CSR-TX, CCR-LA, CSR-CA-13648, RDR, CRR, CRC, Notary Public, hereby certify that the witness was duly sworn and that this transcript is a true record of the testimony given by the witness;

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Subscribed and sworn to by me this day, the 25th day of May, 2020.

_____

Susan Perry Miller, RDR, CRR, CRC
TX CSR-4083, Exp: 10/31/2022
WRIGHT WATSON & ASSOCIATES
Texas Court Reporting Firm CRF-225
1250 S. Capital of Texas Highway
Building 3, Suite 400
Austin, Texas 78746
(512) 474-4363 / (512) 474-8802 (fax)

Exhibit N

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated, Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-01115
BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, And TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendant.	§	

****

REMOTE ORAL DEPOSITION OF

LADDY VALENTINE

JUNE 10, 2020

****

REMOTE ORAL DEPOSITION of LADDY VALENTINE, produced as a witness at the instance of the Defendants, and duly sworn, was taken in the above-styled and numbered cause on Wednesday, June 10, 2020, from 10:11 a.m. to 3:34 p.m. Central Time, before Steven Stogel, CSR in and for the State of Texas, remotely reported via Machine Shorthand, pursuant to the Federal Rules of Civil Procedure.

Q. What is your best estimate?

A. 25 feet, maybe.

Q. So, just to make sure I'm understanding, your best estimate is that when you exit cubical No. 6, the sink in Dorm No. 14 is about 25 feet from cubical No. 6. Is that right?

A. 25 to 30 feet, yes. That's a guess.

Q. Well, when you say it's a guess, I mean, you've been there, and you've seen this area. Right?

A. Right. But I've never measured it.

Q. Okay. So you have a factual basis for providing me with that estimate of 25 to 30 feet. Is that right?

A. I have a -- I don't know how factual, but it's a good guess.

Q. All right. Now, I understand that you use a walker to get around. Is that right?

A. Yes. Yes.

Q. How long have you used a walker?

A. I've had a walker since 1993.

Q. Do you use your walker all of the time or something less than all of the time to get around?

A. A majority of the time.

Q. For example, did you use your walker to travel from Dorm 14 to the law library for your deposition

today at the Pack Unit?

A. Absolutely.

Q. I made you laugh. How come you're laughing?

A. Well, I might not have made it.

Q. Is it a long distance from Dorm 14 to the law library?

A. It's a good -- it's a good distance. I'm going to guess it's a football field and some.

Q. Okay. Well, I'm a big football field -- or a football fan, so I can understand football field. That helps me.

Because your distance you have to travel from your cubical No. 6 in Dorm 14 is 25 to 30 feet to get to the sink in Dorm 14, do you always use your walker to get to the sink in Dorm 14?

A. Yes. There's been one time when I didn't, but I had my leg brace on then. As long as I've got my leg brace on, short distances aren't too bad, but when I don't have my leg brace on, then I -- then I must have my walker because of the drop foot.

Q. And I was going to ask you about that. I've read your declaration, and I have had other friends that have had drop foot, and they've worn a leg brace. Do you wear your leg brace most of the time to prevent or mitigate your drop foot condition?

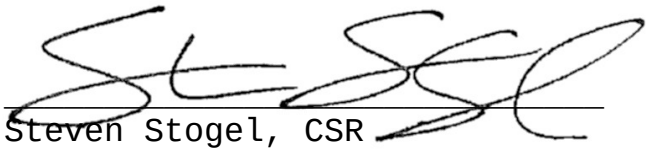
STATE OF TEXAS)

REPORTER'S CERTIFICATION

I, STEVEN STOGEL, CSR, hereby certify that the witness was duly sworn and that this transcript is a true record of the testimony given by the witness.

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Subscribed and sworn to by me this day, June 11, 2020.



Steven Stogel, CSR
Texas CSR 6174
Expiration: 4/30/2021
INTEGRITY LEGAL SUPPORT SOLUTIONS
P.O. Box 245
Manchaca, Texas 78652
www.integrity-texas.com
512-320-8690; FIRM # 528

Exhibit O

DECLARATION OF Marcy Steele

"I am over 21 years of age, of sound mind, capable of making this declaration, and personally acquainted with the facts herein stated.

I am the custodian of records for the Warden's Office at the Wallace Pack Unit a part of the Texas Department of Criminal Justice (TDCJ) located in Navasota, Texas. Attached are true and correct copies of ***Pack Unit Master Rosters 5/18/20 & 5/26/20*** which are kept by the TDCJ in the regular course of its business activity. The entries of such records were made as a regularly conducted activity and a regular practice of the TDCJ, and were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters.

My name is Marcy Steele and I am an employee of the TDCJ, a governmental agency. I am executing this declaration as part of my assigned duties and responsibilities. I declare under penalty of perjury that the foregoing is true and correct."

Executed in Grimes County, State of Texas, on the 29th day of May, 2020.

Marcy Steele

Marcy Steele
Administrative Assistant II
Warden's Office/Pack Unit/CID
Texas Department of Criminal Justice

LK00003 T.D.C.J. - INSTITUTIONAL DIVISION PAGE 1
UNIT: PACK I MASTER ASSIGNMENT ROSTER 05/26/2020
NAME SEQUENCE 12:43:05

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01987709	AARON, DARELL GENE	S3	W	G2	B 7-036B	UNASGN MEDICAL
00592254	ADAMS, CHARLES HOMER	S3	W	G2	D 14-012B	UNASGN MEDICAL ISOLATION
00296473	ADAMS, CLARENCE EDWARD	S3	B	G2	E 19-059B	FOLDER LAUNDRY
00632670	ADAMS, JEFFREY ROBERT	L2	W	G2	B 5-039B	JANITOR DORM 1-2
01350659	ADAMS, LEROY	S3	W	G2	B 7-034B	UNASGN MEDICAL
02153066	ADAMS, MATTHEW THOMAS	S2	W	OT	TC1-052B	TRACTOR OPERATOR
01543175	AGUILAR, LUIS GERARDO	L1	H	G2	C 12-019B	TRASH COLLECTOR UNIT
01665992	AGUILAR, ROBERTO CASARES	S3	H	G2	C 09-030B	UNASGN MEDICAL
02003899	AGUIRRE, REYNALDO LAGUNAS	S2	H	OT	TC1-093B	ANIMAL CARETAKER KENNEL
01894172	ALAKE, ADELANKE SAMUEL	S3	B	G2	E 18-006B	JANITOR DORM 2-2
01851062	ALBA, JAMES	L1	W	G3	A 3-049B	I/S MEDICAL SQ 01
01464905	ALBERT, VERLEE JR	S3	B	G2	C 11-012B	JANITOR DORM 1-2
00817139	ALCALA, FRANK	S3	H	G2	C 09-046B	I/S MEDICAL SQ 01
01057446	ALEXANDER, CALVIN	S3	B	G2	D 14-045B	UNASGN MEDICAL ISOLATION
02299483	ALEXANDER, STEVEN	L1	B	OT	TC2-005B	FOLDER LAUNDRY T/C
01744217	ALLEN, DAVID NEAL	S2	W	G1	E 20-015B	CLOTHING ATTENDANT OFFICER
02217319	ALLEN, PATRICK CHARLES	S3	B	G2	B 6-049B	I/S MEDICAL SQ 02
00310068	ALLEN, RONALD E	S3	B	G2	C 11-046B	FOLDER LAUNDRY
01908359	ALMANZA, ANTHONY CARLOS	S2	H	G1	E 20-007B	JANITOR DORM 1-1
01996592	ALOMIA, JAMER ALBEIRO	S3	B	G2	C 11-048B	JANITOR DORM 1-1
00612879	ALSABROOK, JAMES ARTHUR	S3	W	G2	A 3-041B	UNASGN MEDICAL
01422922	ALVAREZ, GARY	S3	H	G2	E 19-020B	FOLDER LAUNDRY
02007979	ALVAREZ, ROY	S3	H	G2	A 4-003B	UNASGN MEDICAL
01873771	ALVIDREZ, DELFINO SR	S3	H	G2	E 20-006B	JANITOR DORM 1-2
01855699	ANCIRA, PEDRO	S3	H	G2	A 3-017B	I/S MEDICAL SQ 01
01713493	ANDERSON, CHAD ALLEN	S3	H	G2	C 10-044B	JANITOR DORM 2-1
00621394	ANDERSON, JAMES LONZO	S2	W	OT	TC2-031B	MAINTENANCE MECHANIC OUTSIDE
00696018	ANDERSON, LEWIS	S3	B	G2	A 2-004B	JANITOR DORM 1-2
01654269	ANDERSON, RANDY RAY	S3	W	G2	D 13-024B	UNASGN MEDICAL ISOLATION
01812491	ANDERSON, TRAVIS EDWARD	S3	B	G2	B 6-028B	FOLDER LAUNDRY
00801052	ANGELO, GREGORY CHRIS	S3	W	G2	A 3-012B	I/S MEDICAL SQ 01
01667969	ANGUIANO, MARCIAL MICHAEL	S3	H	G2	E 20-034B	WORK SQUAD 05
02297036	ARDS, CLINTON	L1	B	G2	C 11-014B	I/S MEDICAL SQ 01
01952719	ARMENDAREZ, JOHN SIMON	S2	H	OT	TC2-081B	KITCHEN HELPER 1ST T/C
01971181	ARMENDARIZ, ARTURO JR	S2	H	OT	TC3-054B	JANITOR COMMISSARY T/C
01675648	ARMSTRONG, DARIUS ANTOINE	L3	B	G4	TRANS-05B	TRANS TRANSFER CUST DOWNGRADE
01468858	ARMSTRONG, KENNETH RAY	S3	B	G2	B 6-011B	UNASGN MEDICAL
02196217	ARMSTRONG, RICHARD GENE	S2	W	OT	TC3-065B	KITCHEN HELPER 1ST T/C
01858455	ARMSTRONG, ROY GLEN	S3	W	G2	E 20-061B	GEN CLERK CRAFTSHOP
00607089	ARMSTRONG, WILLIAM BROOKS	S3	W	G2	A 1-013B	UNASGN MEDICAL
01823351	ARNOLD, PATRICK EDWARD	S3	W	G2	A 1-051B	UNASGN MEDICAL
00651751	ARNOLD, ROBERT WILLIAM	S3	W	G2	E 19-010B	I/S MEDICAL SQ 01
02253015	ARREDONDO, JAIME	S3	H	G3	E 19-063B	JANITOR DORM 1-2
00901357	AUGUST, JIMMY JOHN	S3	B	G2	A 4-012B	UNASGN MEDICAL
01780897	AVILES, MIGUEL A	L1	H	G2	B 8-028B	FOLDER LAUNDRY
01611933	AXLEY, DENNIS ED	S3	B	G2	B 8-015B	UNASGN MEDICAL
01712458	BABERS, DANNY PAUL	L2	B	G2	D 13-017B	UNASGN MEDICAL ISOLATION
00463115	BAILEY, CHARLES RAY	S3	B	G2	EDUC-004B	UNASGN PENDING ASSIGNMENT
01757850	BAILEY, HORREESE BERNARD	S3	B	G2	E 20-084B	JANITOR CLEAN ISSUE 1ST
02191611	BALDWIN, GREGORY WAYNE	S3	B	G2	B 5-033B	I/S MEDICAL SQ 02
02302627	BALLARD, TYRONE ANTONIO	L1	B	G2	D 13-046B	UNASGN MEDICAL ISOLATION
00334000	BARBER, GARY RAY	S3	W	G2	C 12-004B	FOLDER LAUNDRY
00185946	BARLOW, RONALD L	S3	W	G2	B 5-015B	UNASGN MEDICAL

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
02038321	BARNARD,KENNETH LEO	S3	W	G3	A 3-051B	I/S MEDICAL SQ 01
02074654	BARNES,JIMMY ARTHUR	L1	W	G2	C 09-041B	FOLDER LAUNDRY
01918739	BARNES,JOHNNY	S2	B	OT	TC3-061B	FOLDER LAUNDRY T/C
02219533	BARRETT,MICHAEL TODD	S2	W	OT	TC1-033B	FARM EQUIPMENT MECHANIC I
01966539	BARRIENTES,RENE	S3	H	G2	E 18-041B	JANITOR DORM 2-2
02164183	BARRUS,SCOTT ALLEN	S2	W	OT	TC1-003B	FARM EQUIPMENT MECHANIC I
02022623	BARTHELMAN,GREGG	S3	W	G2	B 8-049B	COUNTER ATTENDANT 1ST
02241790	BASS,SAMUEL DEWEY	S2	W	OT	TC3-020B	JANITOR FRONT OFFICE 1ST
02017324	BASSETT,ELBE III	S2	B	OT	TC3-024B	LANDSCAPE GARDENER
02168976	BAVARO,ROBERT THOMAS	S3	W	G2	E 18-034B	UTILITY SQ CAPTAIN
00307330	BAXLEY,GERRY WELDON	S3	W	G2	B 7-042B	UNASGN MEDICAL
01979250	BAXTER,TERRY DON	S2	W	OT	TC2-050B	GROUNDSKEEPER O/S YD SQ 02 A
00330066	BEAIRD,GEORGE EARL	S2	B	OT	TC3-025B	FOLDER LAUNDRY T/C
01473289	BEAL,ROGER S	S3	W	G2	A 2-022B	UNASGN MEDICAL
02300242	BEAR,MARQUIS RAY	L1	W	OT	TC2-015B	KITCHEN HELPER 1ST T/C
01972527	BEASLEY,ALBERT EDWARD	S3	B	G2	E 19-054B	JANITOR DORM 2-1
02265549	BECKER,JEFFREY	S3	W	G2	D 15-019B	UNASGN MEDICAL ISOLATION
01602179	BELCHER,JAMES	S3	B	G2	B 7-020B	I/S MEDICAL SQ 02
02053558	BELDEN,JAMES ALAN	S2	W	OT	TC2-076B	JANITOR DORM T/C 2-1
01902230	BELL,BENJAMIN GLENN	S3	W	G2	D 13-039B	UNASGN MEDICAL ISOLATION
01989504	BELTRAN,DAVID	S3	H	G2	B 5-017B	JANITOR DORM 1-1
01311244	BENAVIDEZ,ROBERTO	S3	H	G2	E 20-051B	FIELD MINISTER
01994579	BEND,LONNIE LEE JR	S3	B	G2	C 11-023B	UNASGN MEDICAL
01794334	BENITEZ,JOHN LUCAS	S3	H	G2	C 10-028B	WORK SQUAD 02
01210028	BERG,ERIC GUNNAR	S3	W	G2	D 14-003B	UNASGN MEDICAL ISOLATION
02087993	BERNAL,JOHNNY	S3	H	G2	C 11-028B	I/S MEDICAL SQ 01
02230177	BERRY,CHARLES EDWARD	S2	W	OT	TC2-106B	UNASGN MEDICAL
01283882	BERUBE,MICHAEL CYR	S3	W	G2	E 18-023B	STOCK CLERK LAUNDRY 1ST
01011158	BETZ,GEORGE HENRY	S3	W	G2	A 1-028B	UNASGN MEDICAL
00755505	BEVEL,REGINALD CHARLES	S3	B	G2	E 19-008B	JANITOR MEDICAL
01575631	BIGBEE,JEREL DOUGLAS	S4	W	G2	A 1-026B	FOLDER LAUNDRY 2ND
01528702	BIRDOW,BYRON LYDELL	S3	B	G2	E 20-074B	COUNTER ATTENDANT 2ND
01875247	BISHOP,HEATH ALAN	S3	H	G3	E 19-068B	COUNTER ATTENDANT 1ST
00583021	BISHOP,TERRY JOE	S3	W	G2	C 10-024B	UNASGN MEDICAL
02263441	BISHOP,THOMAS VICTOR	S3	W	G2	B 5-001B	I/S MEDICAL SQ 02
00547521	BLACK,JAMES HENRY	S3	W	P7	AP-16B	PROTECT SAFEKEEPING PSK7
01686499	BLACK,VICTOR JEWELL	S4	B	G3	D 15-021B	UNASGN MEDICAL ISOLATION
01532742	BLACKWELL,WILLIAM HARRISON	S3	W	G2	B 5-023B	UNASGN MEDICAL
02278196	BLEDSOE,GREGORY DWAYNE	S2	B	OT	TC2-049B	JANITOR BOQ
01198449	BLEVINS,ROBERT WAYNE	S3	W	G2	C 10-006B	UNASGN MEDICAL
01126777	BOEHM,DONALD	S3	W	G2	B 7-010B	COUNTER ATTENDANT 3RD
02239247	BOLDEN,JEREMY CHAD	S2	W	OT	TC1-029B	TRACTOR OPERATOR
02084908	BOLDON,KELVIN DWAYN	S3	B	G2	C 10-022B	KITCHEN HELPER 3RD
02229707	BOLTON,DAVID WAYNE	S2	W	OT	TC2-055B	TRACTOR OPERATOR BR
02124798	BOMKAMP,ROBERT ANTHONY	S3	W	G2	B 6-042B	JANITOR DORM 1-1
01816947	BONTON,PATRICK BERNARD	S2	B	OT	TC1-038B	KITCHEN HELPER 1ST T/C
01827604	BOWDEN,RANDOLPH	S3	B	G2	A 2-029B	UNASGN MEDICAL
02281855	BOWLIN,WILLIAM BARRIE	S3	W	G2	B 8-042B	I/S MEDICAL SQ 02
01000968	BOYD,RICHARD LEO	S3	W	G2	B 8-031B	I/S MEDICAL SQ 02
00870550	BRADLEY,MELVIN	L2	B	G2	A 2-020B	JANITOR DORM 2-1
01837524	BRADLEY,MERIA JAMES	S2	B	OT	TC3-050B	FOLDER LAUNDRY T/C
02236376	BRADSHAW,MELVIN BRANDON	S2	W	OT	TC1-006B	FARM EQUIPMENT MECHANIC I BR
00804834	BRAGG,CHARLES RAY JR	S3	W	G2	B 8-006B	UNASGN MEDICAL

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
02118168	BRENGEL, ALLEN ROY	S2	W	OT	TC2-019B	FOLDER LAUNDRY T/C
00921565	BREWTON, WADE G	S3	B	G2	C 10-033B	FOLDER LAUNDRY
01866897	BROGDON, DANNY	S3	W	G2	D 13-036B	UNASGN MEDICAL ISOLATION
00486107	BRONER, DONALD LOY	S3	W	G2	B 6-045B	FOLDER LAUNDRY
00568363	BROOKINS, FREDDIE	S3	B	G2	A 4-022B	UNASGN MEDICAL
00323246	BROOKS, JOHN DANIEL	L2	B	G2	A 2-025B	UNASGN MEDICAL
02078871	BROWDER, DERRICK DEVON	S3	B	G2	E 19-079B	KITCHEN HELPER 2ND
01819940	BROWN, CHESTER DEAN	S3	W	G2	C 10-046B	UNASGN MEDICAL
02083159	BROWN, JAMARCUS	S2	B	OT	TC2-002B	JANITOR DORM T/C 1-2
01681404	BROWN, KEITH ALAN	S2	W	OT	TC2-084B	COMMUNITY SERV MAJOR 03 SQ
01548499	BROWN, LESLIE LEE	S3	W	G2	B 7-007B	I/S MEDICAL SQ 01
00365547	BROWN, NARRIES EARL	L3	W	G2	A 1-036B	UNASGN MEDICAL
02096329	BROWN, ROBERT JAY	S3	W	G2	EDUC-018B	UNASGN PENDING ASSIGNMENT
02164047	BROWN, STEVEN MICHAEL	S2	W	OT	TC2-068B	COMMUNITY SERV MAJOR 03 SQ
01425916	BRYAN, ROBERT DEAN	S3	W	G2	B 6-053B	I/S MEDICAL SQ 02
01308810	BRYANT, EDWARD ELLIOTT	S3	B	G2	D 16-004B	FOLDER LAUNDRY
01927130	BRYANT, JOHNNY HARLEN	S2	W	OT	TC1-091B	FOLDER LAUNDRY T/C
01286403	BUCKLEY, ALTON	S3	B	G2	EDUC-022B	UNASGN PENDING ASSIGNMENT
01132132	BUGGE, DONALD	S2	W	OT	TC3-076B	STOCK CLERK SUPPLY
01251547	BULINGTON, WILLIAM GLENN JR	S3	W	G2	C 11-026B	KITCHEN HELPER 1ST
02012131	BULLARD, CHRISTOPHER ALANPHIL	S2	W	OT	TC2-014B	KITCHEN HELPER 1ST T/C
02243585	BULLOCK, FRANCIS LEE	S3	W	G2	B 5-044B	I/S MEDICAL SQ 01
01686168	BULLOCK, ROBERT GORDEN	S3	W	G2	B 7-026B	UNASGN MEDICAL
01911035	BURNHAM, WILLIAM HENRY	S3	W	G2	B 6-029B	UNASGN MEDICAL
01383447	BURNS, BRUCE STANTON	S3	W	G2	E 20-048B	BOILER OPERATOR 3RD
02098960	BURROWS, TERRY ZANE	S2	W	OT	TC2-060B	KITCHEN HELPER 1ST T/C
00864554	BURRUSS, LLOYD	S3	W	G3	A 4-014B	UNASGN MEDICAL
01780502	BUSBEY, JOHN RICHARD	S3	W	G3	E 19-007B	I/S MEDICAL SQ 01
01238964	BUTAUD, GARY LEWIS	S3	W	G2	D 13-031B	UNASGN MEDICAL ISOLATION
00177137	BYARS, HAROLD LEE	S3	B	G2	E 19-046B	I/S MEDICAL SQ 01
02197492	BYFORD, RICHARD BYREN JR	S2	W	OT	TC2-044B	KITCHEN HELPER 1ST T/C
01814718	CABALLEROS, DAVID	L1	H	G2	TRANS-07B	UNASGN MEDICAL ISOLATION
01029776	CABRERA, RAMON P	S3	H	G2	E 19-027B	UNASGN MEDICAL
01047466	CAFFEY, MICHAEL	S3	W	G2	E 18-004B	BOILER OPERATOR 2ND
01886490	CAGLE, TIMOTHY JAY	S3	W	G2	E 20-056B	ICE & WATER DISTRIBUTOR 1-1
00401418	CAIN, CLYDE URA SR.	S3	W	G2	B 7-044B	UNASGN MEDICAL
01539610	CALDERON, ALEX	S3	H	G2	E 19-023B	SAFETY TECH FIREWATCH KIT 1ST
01916715	CALLAHAN, ANTHONY LAROY JR	S2	B	OT	TC3-070B	GROUNDSKEEPER O/S YD SQ 02 A
01351705	CALLISON, DONALD ROYCE	S3	W	G2	D 15-010B	UNASGN MEDICAL ISOLATION
02186885	CAMARILLO, LEAMUEL	S2	H	OT	TC2-011B	JANITOR DORM T/C 2-2
01927270	CAMPBELL, BILLY JOE	S3	W	G2	E 19-015B	UNASGN MEDICAL
00647103	CAMPBELL, JOEL L	S3	W	G2	A 3-011B	UNASGN MEDICAL
02240984	CAMPBELL, LAMARR ANTWAIN	S2	B	OT	TC1-010B	PAINTER SQUAD BLDG
02284256	CAMPBELL, LEONARD GEORGE	S2	W	OT	TC3-015B	UNASGN MEDICAL
01723300	CANTU, CHRISTOPHER LEE	S3	H	G2	E 18-039B	KITCHEN HELPER 2ND
01772509	CAPPS, DENNIS WAYNE	S3	W	G2	E 18-010B	KITCHEN HELPER 1ST
01675667	CAPUCHINO, SALVADOR HERNANDEZ	S3	H	G2	C 12-002B	I/S MEDICAL SQ 01
01248101	CARBAJAL, DIONICIO	S3	H	G2	A 1-001B	UNASGN MEDICAL
01509644	CARBAJAL, JOSE	S3	H	G2	C 09-050B	UNASGN MEDICAL
01462910	CARBALLO, LEEROY CESAR	S3	H	G2	E 18-038B	JANITOR EDUCATION 1ST
00800867	CARDONA, PEDRO	S3	H	G2	D 13-052B	UNASGN MEDICAL ISOLATION
02013181	CAREY, STEPHEN CRAIG	S3	W	G2	D 15-044B	UNASGN MEDICAL ISOLATION
01940525	CARRILLO, RICARDO	S4	H	G2	A 1-015B	I/S MEDICAL SQ 02

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
02099275	CARROLL,MOSES GLENN	S3	B	G2	B 7-019B	I/S MEDICAL SQ 02
00277265	CARTER,DAVID MEMPHIS	S2	B	OT	TC2-001B	KITCHEN HELPER 1ST T/C
01686080	CARTER,DAVID RAY	S3	W	G2	E 18-045B	ALTERATION TAILOR EXCHANGE RM
01935409	CARTER,EARNEST LEON	S3	B	G2	B 6-052B	COUNTER ATTENDANT 2ND
01292315	CARTER,FREDERICK SHAWNEE	S4	B	G2	B 5-025B	UNASGN MEDICAL
00470253	CARTER,JAMES	S3	B	G2	B 6-031B	UNASGN MEDICAL
01527531	CARTER,JIMMY LEROY	S3	W	G2	A 2-028B	UNASGN MEDICAL
01540248	CARTER,MICHAEL DEWAYNE	S3	B	G2	C 12-044B	SAFETY TECH FIREWATCH KIT 1ST
02177072	CARTER,MYRON FRANK	S2	W	OT	TC1-085B	FARM WORKER LIVESTOCK BR
01957721	CARTWRIGHT,JAMES HENRY	S2	B	OT	TC2-078B	JANITOR CLEANING SQUAD TC
02268159	CASARES,MARCELINO MATA	S3	H	G2	D 15-006B	UNASGN MEDICAL ISOLATION
01242881	CASIQUE,GEORGE	L3	H	G2	D 13-044B	UNASGN MEDICAL ISOLATION
02274758	CASTILLO,ROBERTO	S3	H	G2	C 09-039B	FOLDER LAUNDRY
01036245	CASTLEBERRY,CHARLES JACKSON	S3	W	G2	E 18-028B	ICE & WATER DISTRIBUTOR 1-2
02177563	CASTRO,JUAN GABRIEL	S2	H	OT	TC3-082B	GEN CLERK MAINTENANCE
01909438	CATT,RONALD SCOTT	S3	W	G2	D 13-026B	UNASGN MEDICAL ISOLATION
02011967	CAZARES,ALFONSO	S3	H	G2	B 7-033B	I/S MEDICAL SQ 01
02049778	CECHVALA,MICHAEL JAMES	S2	W	OT	TC1-020B	KITCHEN HELPER 1ST T/C
02295529	CERON,ELEAZAR OLMEDO JR	L1	H	G2	A 4-023B	UNASGN MEDICAL
01862182	CERVANTES,RICHARD	S3	H	G2	C 12-033B	COUNTER ATTENDANT 3RD
00662086	CHAMBERS,BOBBY	S3	W	G2	C 10-008B	FOLDER LAUNDRY
02194302	CHANDLER,LARRY JOE	S2	W	OT	TC3-019B	GENERAL CLERK SURPLUS WRHSE
02132760	CHANDLER,RAYFORD	L1	B	G2	C 09-001B	UNASGN MEDICAL
01491585	CHAPA,EDUARDO	L1	H	G2	C 10-038B	WASHING MACHINE OPERATOR
01384731	CHAPMAN,GERALD JAMES JR	S3	W	G2	B 5-043B	UNASGN MEDICAL
01666937	CHAVEZ,DANIEL MUNOZ	S3	H	G2	B 5-004B	UNASGN MEDICAL
01719864	CHAVEZ,GABRIEL ALEX	S3	H	G2	A 2-019B	UNASGN MEDICAL
01157393	CHOICE,ARBIE	S3	B	G2	C 09-015B	UNASGN MEDICAL
00666212	CHOICE,STEVE	S2	B	OT	TC3-006B	FOLDER LAUNDRY T/C
01776962	CHOICE,WILLIE EDWARD	S3	B	G2	D 13-004B	UNASGN MEDICAL ISOLATION
01993053	CHOJOLAN XICARA,OSVALDO	S3	H	G2	E 20-045B	JANITOR COMMISSARY 1ST
01085223	CLAIBOURNE,CHARLES A	L1	W	G2	A 4-024B	UNASGN MEDICAL
02016061	CLAMP,DELBERT B	S3	W	G3	A 3-015B	UNASGN MEDICAL
02125693	CLARK,BRENT SCOTT	S2	W	OT	TC1-077B	FOLDER LAUNDRY T/C
01986840	CLARK,STEPHEN	S3	W	G2	E 19-050B	FOLDER LAUNDRY
02197186	CLARK,TRENTON RAY	S2	W	OT	TC2-082B	KITCHEN HELPER 1ST T/C
01385209	CLAYTON,MICHAEL EDWARD	S4	W	G2	A 4-005B	UNASGN MEDICAL
02013732	CLEMANS,BENJAMIN RAY	S3	W	G2	E 20-065B	WORK SQUAD 05
01677666	CLEMENTS,HAROLD RAY	S3	W	G2	C 12-040B	KITCHEN HELPER 1ST
01994731	CLICK,GARY DON	S3	W	G2	C 11-001B	COUNTER ATTENDANT 3RD
02199920	CLICK,THOMAS WILLIAMS JR	S3	W	G2	C 09-014B	UNASGN MEDICAL
01900101	COBBS,JAMES	S2	B	OT	TC3-101B	ALTERATION TAILOR T/C
02103952	COCHRAN,WILLIAM SHANE	S3	W	G2	C 10-051B	FOLDER LAUNDRY
01756291	COCKERHAM,PHILIP	S2	W	OT	TC1-032B	JANITOR FARM SHOP
02157368	COCKERHAM,WILLIE ROY JORDAN	S3	W	G2	B 6-014B	UNASGN MEDICAL
01470339	COLE,BENNY L JR	S3	B	G2	D 15-033B	UNASGN MEDICAL ISOLATION
01778152	COLE,CHRISTAIN W	S2	W	OT	TC3-090B	WASTEWATER TREAT ATTEND
01913556	COLE,DON DOUGLAS	S3	W	G2	E 19-029B	WORK SQUAD 02
01820523	COLEMAN,BILLY	S3	W	G2	EDU-003B	UNASGN PENDING ASSIGNMENT
01874048	COLEMAN,BRANDON BLAKE	S4	W	G2	D 13-006B	UNASGN MEDICAL ISOLATION
01758244	COLLAZO,NELSON ADJIMIRO	S4	H	G2	B 6-038B	UNASGN MEDICAL
01884849	COLLINS,BILLY MAX	S3	W	G2	E 19-024B	UNASGN MEDICAL
01810867	COLLINS,DAVID BRANDON	S2	B	OT	TC3-048B	GROUNDSKEEPER O/S YD SQ 02 A

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00298978	COLLINS,DOUGLAS	L1	B	G2	C 09-033B	UNASGN MEDICAL
00376623	COLLINS,JOHN ELLIOT	S3	W	G2	A 4-028B	UNASGN MEDICAL
00868676	COLLINS,LONNIE RAY	S4	B	G2	A 1-017B	UNASGN MEDICAL
01285988	COLLINS,RODERICK	S3	B	G2	E 20-091B	TRASH COLLECTOR UNIT
01609932	COMER,JOSH	S3	W	G2	E 20-071B	LANDSCAPE GARD INSIDE YD SQ 01
01860137	CONNER,JOSEPH DON	S2	W	OT	TC2-074B	TRUCK DRIVER HEAVY BR
01938566	CONSTANCIO,MANUEL	S3	H	G2	E 20-028B	WORK SQUAD 04
02026685	COOK,JERRY AUSTIN	S3	W	G2	B 6-007B	UNASGN MEDICAL
00618389	COOLEY,DENNIS FRANKLIN	S3	W	G2	C 12-011B	UNASGN MEDICAL
01929968	COOLEY,STEVEN E	S3	W	G2	E 17-044B	ICE & WATER DISTRIBUTOR 1-2
01986304	COOPER,JOYCE L	S3	B	G2	B 7-002B	UNASGN MEDICAL
01989240	COOPER,RICKIE	S3	B	G2	C 10-025B	KITCHEN HELPER 1ST
02139565	COOPER,RONALD EVAN	S3	W	G3	A 3-036B	UNASGN MEDICAL
01998051	CORDERO,JUSTIN RAFAEL	S3	H	G2	D 15-027B	UNASGN MEDICAL ISOLATION
02139242	CORONADO,ADRIEN QUANG	S3	H	G2	D 14-023B	UNASGN MEDICAL ISOLATION
02023679	CORRAL,RIGOBERTO	S3	H	G2	C 12-028B	FOLDER LAUNDRY
01489338	CORTEZ,ALEJANDRO	S2	H	OT	TC3-041B	JANITOR FRONT OFC T/C 2ND
01892325	CORTEZ,MAURICE RAY	S3	B	G2	C 09-010B	JANITOR DORM 1-1
01930443	COX,ARLON	S2	W	G1	E 20-009B	FOLDER LAUNDRY
01905330	CRANDALL,GEORGE	S3	W	G2	C 12-032B	JANITOR DORM 2-2
00498895	CRAVENS,WOODY EARL	S3	W	G2	E 20-067B	JANITOR DORM 2-1
02117932	CRAWFORD,ARTHUR HENRY	S2	B	OT	TC3-018B	INDUST TRUCK OPR SURPLUS WRHSE
00267268	CRAWFORD,WILLIE RAY	S3	B	G2	A 3-003B	I/S MEDICAL SQ 02
00232292	CREEL,JAMES DUKE	S3	W	G2	A 1-019B	UNASGN MEDICAL
01451630	CROUCH,JAMES LEE	S3	W	G2	E 19-052B	I/S MEDICAL SQ 01
01786942	CRUZ,LEONEL	S3	H	G2	A 3-021B	JANITOR DORM 2-2
01991493	CRYER,MICHAEL EDWARD	S2	W	OT	TC2-024B	TRACTOR OPERATOR BR
02267262	CULPEPPER,RUSSELL WAYNE	S2	W	OT	TC1-068B	KITCHEN HELPER 1ST T/C
02153663	CUMMINGS,DAVID WAYNE	S2	W	OT	TC2-092B	WASTEWATER TREAT ATTEND
00240516	CURRIE,CLIFTON	S3	W	G2	C 10-035B	I/S MEDICAL SQ 01
02260200	CURTIS,HENRY RYAN	S2	W	OT	TC1-019B	FARM WORKER LIVESTOCK BR
01938100	DANIELS,CLAIBORNE ONEAL JR	S3	B	G2	E 20-018B	JANITOR DORM 2-1
02286343	DANNER,ROBERT LEE	S3	W	G2	B 8-013B	UNASGN MEDICAL
02164497	DARDEN,CLIFFORD LAWRENCE	S3	B	G2	C 11-037B	I/S MEDICAL SQ 01
01453054	DARNELL,DONALD RAY	S3	W	G2	A 3-023B	FOLDER LAUNDRY
01140524	DAVENPORT,JAMES CLAYTON	S3	W	G2	A 4-007B	UNASGN MEDICAL
01982590	DAVILA,LORENZO	S3	H	G2	B 8-021B	FOLDER LAUNDRY
01634666	DAVIS,ANTHONY OBRIAN	S3	B	G2	E 18-018B	JANITOR SHOWER 1ST
00501307	DAVIS,BRUCE EDWARD	S3	B	G2	C 11-018B	JANITOR LAUNDRY 2ND
01945898	DAVIS,DAVID CLYDE	S3	W	G2	E 19-042B	I/S MEDICAL SQ 02
02105119	DAVIS,GREGGORY BRENT	S3	W	G2	D 13-016B	UNASGN MEDICAL ISOLATION
00637944	DAVIS,HERMAN	S3	B	G2	E 19-048B	FOLDER LAUNDRY 2ND
02024468	DAVIS,ISIAH	S2	B	OT	TC3-062B	JANITOR CLEANING SQUAD TC
02191347	DAVIS,OTIS LEE	S3	B	G2	A 2-015B	UNASGN MEDICAL
01803896	DAVIS,RICKY LEE	S2	W	OT	TC1-023B	HEAVY EQUIPMENT OPERATOR BR
02090028	DAVIS,ROY	S3	B	G2	A 1-004B	UNASGN MEDICAL
01958469	DAY,ARNOLD EVERETT	S2	W	OT	TC3-067B	FOLDER LAUNDRY T/C
00567402	DE FREECE,HAROLD LINDSAY	S3	B	G2	E 19-055B	JANITOR DORM 2-2
00883693	DEAN,WILLIAM LOUIS	S3	B	G2	E 19-035B	UNASGN MEDICAL
01155341	DEASES,ESTEVAN	S3	H	G2	B 7-024B	I/S MEDICAL SQ 01
00850243	DEATON,JACKIE LYNN	S3	W	G2	B 7-031B	UNASGN MEDICAL
00670464	DEBINE,JOSEPH JR	S3	B	G2	EDUC-020B	UNASGN MEDICAL ISOLATION
01274726	DEBOSE,MAURICE DELYONE	S2	B	OT	TC2-004B	FOLDER LAUNDRY T/C

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
02168057	DELACEY,DAVID ODEN	S2	W	OT	TC3-013B	GROUNDSKEEPER T/C SQUAD
01007739	DELAROSA,ALBERTO CRUZ	S3	H	G2	E 18-013B	JANITOR DORM 2-1
01577133	DELGADO,JUAN JOSE	S3	H	G2	E 18-009B	JANITOR DORM 1-2
01682972	DELONG,MICHAEL	S3	W	G3	A 4-004B	UNASGN MEDICAL
02012317	DELUNA,ERIC	S3	H	G2	B 8-003B	KITCHEN HELPER 1ST
01547981	DENSON,ENNIS LEE	L1	B	G2	C 12-025B	UNASGN MEDICAL
01962017	DERRICK,KENNETH LOUIS	S3	W	G2	C 12-017B	UNASGN MEDICAL
00888995	DEVER,GARY LEE	S3	W	G2	EDUC-014B	UNASGN PENDING ASSIGNMENT
01927246	DIAZ,MICHAEL	S3	H	G2	E 18-020B	KITCHEN HELPER 1ST
02194025	DIEKMAN,GARY	S3	W	G2	B 6-013B	JANITOR DORM 2-2
02092134	DIETERMAN,GARY L	S3	W	G2	A 2-003B	UNASGN MEDICAL
01903867	DIXON,CHRISTOPHER GREGORY	S3	B	G2	D 15-015B	UNASGN MEDICAL ISOLATION
02076614	DIXON,JAMES CARROLL	S4	B	G2	C 10-002B	COUNTER ATTENDANT 1ST
01786945	DOBSON,RAYMOND EUGENE	S3	W	G2	A 1-035B	UNASGN MEDICAL
00737364	DOMINGUEZ,ALBERT	S3	H	G2	E 20-049B	JANITOR DORM 1-1
01305056	DORSEY,CLYDE JR	S3	W	G2	A 1-048B	UNASGN MEDICAL
01546575	DORSEY,ERNEST GERALD	S3	W	G2	D 13-041B	UNASGN MEDICAL ISOLATION
00505390	DOUGLAS,CARL D	S2	W	OT	TC3-004B	FOLDER LAUNDRY T/C
01906088	DOUGLASS,STEPHEN	S3	W	G2	D 14-018B	UNASGN MEDICAL ISOLATION
00453033	DOUTHIT,SHANNON MARK	S3	W	G2	E 20-005B	FOLDER LAUNDRY
00255592	DOVE,HAROLD EARNEST	S3	B	G2	A 4-015B	JANITOR DORM 2-2
02078395	DRIVER,LARRY DONNELL	S2	B	OT	TC1-007B	UNASGN MEDICAL
00745287	DUCKWORTH,JOE FREDDY	S3	W	G2	E 20-050B	JANITOR HALL 2-2
01170074	DUDLEY,EARNEST JAMES	L1	B	G2	C 09-026B	COUNTER ATTENDANT 3RD
01743506	DUKES,SHANNON DALE	S3	W	G3	D 14-052B	UNASGN MEDICAL ISOLATION
01134009	DUNLAP,MARVIN JR	S3	B	G2	C 10-034B	FOLDER LAUNDRY
02184724	EADS,LARRY WILLIAM	L3	W	G2	B 8-048B	I/S MEDICAL SQ 01
00779710	EARL,ELMER DARCELL	S3	B	G2	D 16-003B	I/S MEDICAL SQ 02
02282398	EAST,JOHN LOYD	S2	W	OT	TC2-029B	HARVEST WORKER, VEGETABLE
00920466	EASTER,DANIEL BRADY	S3	W	G2	A 4-011B	JANITOR BRASS 2-2
01295878	EBERT,MARK	S3	W	G2	E 20-073B	BOILER OPERATOR 2ND
01844561	ECKEL,WILLIAM KARL	S3	W	G2	B 6-032B	FOLDER LAUNDRY 2ND
01970197	ELIG,DAVID ALLEN	S3	W	G2	A 1-037B	UNASGN MEDICAL
02001950	ELLIS,HERBERT LERELLE	S2	B	OT	TC1-021B	JANITOR FRONT OFC T/C 2ND
01845759	ELLIS,RANDY	S3	B	G2	A 3-035B	JANITOR SHOWER 1ST
02261578	EMEORY,TOSTA LAMONT JR	S3	B	G2	A 2-026B	UNASGN MEDICAL
00807126	ENGLISH,HOWARD	S3	B	G2	B 8-026B	KITCHEN HELPER 2ND
00568353	ENOS,BILLY DERRELL	S2	W	G1	E 20-012B	I/S MEDICAL SQ 02
01870501	ERNSTES,JASON CHARLES	S3	W	G2	D 15-039B	UNASGN MEDICAL ISOLATION
01256027	ESCAMILLA,JUAN RAUL	S3	H	G2	E 19-026B	UNASGN MEDICAL
00382036	ESPARZA,RAUL MEDINA	S3	H	G2	C 12-024B	UNASGN MEDICAL
01095888	ESQUIVEL,EMILIO	S3	H	G2	B 7-035B	JANITOR DORM 1-1
01872104	ESTRADA,RICARDO	S3	H	G2	E 18-019B	KITCHEN HELPER 1ST
01763504	ESTRADA,ROY RALPH	S3	W	G3	A 3-007B	JANITOR DORM 1-2
02205051	EVANS,DAYTON BUD	S2	W	OT	TC2-073B	UNASGN MEDICAL
01699662	EVANS,JAMES STOCKTON	S3	W	G2	C 11-025B	ARTIST UNIT
02170374	EVANS,KENNETH WAYNE	S3	W	G2	B 7-021B	FOLDER LAUNDRY
01233238	EVERTT,RICKEY	S3	W	G2	D 15-005B	UNASGN MEDICAL ISOLATION
02288629	EWTON,ANTHONY GLENN	S3	W	G2	C 12-026B	COUNTER ATTENDANT 3RD
00727092	EYTHELL,DEWAYNE KEITH	S3	B	P7	AS-PR-15B	PROTECT SAFEKEEPING PSK7
01063504	FAGAN,THADDEUS C	S3	B	P7	AP-29B	PROTECT SAFEKEEPING PSK7
02175804	FANNIN,RONNIE DELL	S2	W	OT	TC2-051B	LANDSCAPE GARDENER BR
00834755	FARROW,MICHAEL DARRNELL	S3	B	G2	D 15-023B	UNASGN MEDICAL ISOLATION

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00761264	FERDIN,HENRY JR	S3	H	G2	E 18-030B	KITCHEN HELPER 1ST
02065912	FLATT,JEFFERY JAMES	S2	W	G1	E 20-023B	KITCHEN HELPER 1ST
01978530	FLEMING,GARY DON	S3	W	G2	C 10-013B	WORK SQUAD 01
02037797	FLEMING,HAROLD DUANE	S2	W	G1	E 20-064B	KITCHEN HELPER 1ST
01947460	FLORES,JOHN LOWRY	L1	H	P7	AP-21B	PROTECT SAFEKEEPING PSK7
02165950	FLORES,PEDRO SANTIAGO JR	L1	H	G2	C 09-023B	UNASGN MEDICAL
01130672	FLORES,RAYMOND	S3	H	G2	E 18-043B	KITCHEN HELPER 1ST
01876793	FLORES,SALVADORE	S3	H	G2	D 14-034B	UNASGN MEDICAL ISOLATION
02139358	FLOYD,WILLIAM EARL	S2	B	OT	TC3-014B	GROUNDSKEEPER O/S YD SQ 02 A
00808648	FOSSETT,ROBERT GEORGE	S3	W	G2	C 09-012B	I/S MEDICAL SQ 01
02003506	FOSTER,WILLIAM ALBERT III	S2	W	OT	TC2-085B	COMMUNITY SERV MAJOR 03 SQ
02153586	FOX,ANDREW NEIL	S2	W	OT	TC1-022B	FENCE ERECTOR
01748437	FOX,SEAN	S2	W	OT	TC1-084B	BOOTBLACK 1ST
00208829	FRANK,DONALD R	S4	B	G2	C 09-044B	FOLDER LAUNDRY
01575070	FRANK,LEO PAUL JR	S3	B	G2	B 7-030B	FOLDER LAUNDRY 2ND
00658958	FRANKLIN,R Q	S2	B	OT	TC3-037B	JANITOR CLEANING SQUAD TC
00458004	FRANKLIN,TERRY REECE	S2	W	G1	E 20-013B	FOLDER LAUNDRY
01979811	FRITZ,BILLY RAY JR	S3	W	G2	B 8-040B	WORK SQUAD 05
00644433	FRY,TIMOTHY	S4	W	G2	B 7-046B	UNASGN MEDICAL
01795552	FUENTES,RICHARD	S3	H	G2	B 7-047B	CLOTHING EXCHANGER 1ST
02107049	FULTON,RONNIE JOE	S2	W	OT	TC2-025B	COMMUNITY SERV PARK SQ 01
01802325	GALAVIZ,ISMAEL	S3	H	G3	A 3-036B	UNASGN MEDICAL
01593481	GALINDO,RUBEN RAY	S3	H	G2	D 15-043B	UNASGN MEDICAL ISOLATION
00505347	GALLAGHER,HUGH JAMES	S3	W	G2	C 11-047B	I/S MEDICAL SQ 01
00671832	GALLEGOS,GREGORIO TORRES	S3	H	G2	C 09-032B	UNASGN MEDICAL
01932726	GALLO,VINCENT JASON	S3	H	G2	D 14-031B	UNASGN MEDICAL ISOLATION
01987986	GALLOW,KAVIN LEE	S2	B	OT	TC1-034B	JANITOR COMMISSARY T/C
01894334	GALVAN,JULIO FRANCISCO	S3	H	G2	E 19-002B	I/S MEDICAL SQ 01
02151168	GAMBLE,DARRYL PAUL	S2	B	OT	TC2-048B	WASHING MACHINE OPERATOR T/C
01202637	GAMEZ,JUAN	S3	H	G2	B 7-028B	I/S MEDICAL SQ 01
01070538	GANDY,DARRELL KEITH	S3	W	G2	C 10-031B	COUNTER ATTENDANT 2ND
01551286	GARCIA,ALFREDO	S3	H	G2	D 15-013B	UNASGN MEDICAL ISOLATION
00793834	GARCIA,JUAN ANTONIO	S3	H	G2	D 13-008B	UNASGN MEDICAL ISOLATION
01989392	GARCIA,LARRY DAVID	S3	W	G2	B 7-003B	I/S MEDICAL SQ 01
00580869	GARCIA,MARCELO	S3	H	G2	B 7-016B	UNASGN MEDICAL
02000157	GARCIA,PEDRO AVALOS	S3	H	G2	E 18-044B	KITCHEN HELPER 1ST
01891364	GARCIA,RAUL	L3	H	G2	AS-AH-02B	PRE-HEARING DETENTION
01652986	GARCIA,SALVADOR	S3	H	G2	B 8-022B	UNASGN MEDICAL
02096690	GARCIA,STEVEN JOSEPH	S2	H	OT	TC3-029B	WASTEWATER TREAT ATTEND
02153051	GARDNER,CORY JAY	S2	W	OT	TC1-097B	HARVEST WORKER, VEGETABLE
01703123	GARDNER,LONNIE LEE	S2	W	OT	TC3-007B	JANITOR FRONT OFFICE 2ND
01634535	GARDNER,QUINCY	S3	B	G2	E 20-037B	BOILER OPERATOR 2ND
00452587	GARIBAY,ALFONSO	S3	H	G2	A 1-041B	UNASGN MEDICAL
02079202	GARRETT,DAVID CONRAD	S3	B	G2	D 14-007B	UNASGN MEDICAL ISOLATION
01441583	GARRETT,DOUGLAS DEAN	S3	B	G2	E 18-016B	KITCHEN HELPER 3RD
01961790	GARRISON,DAVID	S2	W	OT	TC3-045B	JANITOR BACKGATE
02019199	GARY,SCOTT DOUGLAS	S2	W	OT	TC1-096B	JANITOR DORM T/C 1-1
01997316	GARZA,ARTURO JR	S3	H	G2	E 20-076B	LANDSCAPE GARD INSIDE YD SQ 01
02075669	GARZA,JUAN MANUEL	S3	H	G2	A 1-008B	UNASGN MEDICAL
00735825	GARZA,RAYMOND JR	S4	H	G2	E 19-006B	I/S MEDICAL SQ 02
02137735	GATLIN,RICKY DALE	S3	W	G2	B 6-006B	I/S MEDICAL SQ 01
01947200	GEE,ROBERT LEE	L3	B	G2	D 13-001B	UNASGN MEDICAL ISOLATION
02107159	GENTRY,CHRISTOPHER LEE	S3	W	G2	C 12-003B	I/S MEDICAL SQ 02

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01521142	GENTRY,JAMES H	S2	W	G1	E 19-013B	UNASGN MEDICAL
01508344	GERLAND,ERIC ALLEN	S3	W	G2	D 15-009B	UNASGN MEDICAL ISOLATION
01137728	GERMAN,ADRIAN	S4	W	G2	E 19-017B	KITCHEN HELPER 3RD
02001643	GESFORD,JEFFREY DON	S3	W	G2	C 09-054B	JANITOR DORM 2-1
00455292	GIBSON,JAMES	S3	B	G2	B 7-043B	UNASGN MEDICAL
01380780	GIBSON,KAIL EDWARD	S3	W	G2	D 14-047B	UNASGN MEDICAL ISOLATION
01346241	GIL,SANTOS JR	S3	W	G2	B 5-008B	UNASGN MEDICAL
02070029	GILLESPIE,LEONTA REMON	S3	B	G2	E 18-008B	JANITOR INMATE PROPERTY
00620145	GLENDINNING,ROBERT WAYNE	S3	W	G2	A 1-023B	UNASGN MEDICAL
01317116	GLUNT,STEPHEN DELAND	S3	W	G2	B 7-051B	I/S MEDICAL SQ 02
01183712	GOAD,STEVIN FRANK	S3	W	G2	A 3-047B	UNASGN MEDICAL
01888818	GODFREY,ARRAND EUGENE	S3	B	G2	C 12-039B	TRASH COLLECTOR UNIT
02109972	GOLIGHTLY,KENNETH	L1	W	G2	E 19-091B	JANITOR DORM 2-1
01678908	GOMEZ,GUADALUPE	S3	H	G2	C 11-007B	JANITOR DORM 2-1
01240088	GOMEZ,JOSE ADAM	S3	H	G2	E 19-016B	JANITOR BRASS 2-1
02012494	GOMEZ,RICARDO	S3	H	G2	E 20-055B	UTILITY SQ CAPTAIN
02248935	GOMEZ,SAMUEL VOLANOS	S2	W	G1	E 20-020B	UNASGN MEDICAL
02145335	GONZALES,ESIQUIO	S2	H	OT	TC1-043B	GROUNDSKEEPER O/S YD SQ 02 A
01898399	GONZALES,GALO	S3	H	G3	A 3-001B	UNASGN MEDICAL
01676408	GONZALES,GILBERT SR	S3	H	G2	E 20-032B	CLOTHING EXCHANGER 1ST
02013112	GONZALES,JUAN	S3	H	G2	D 13-051B	UNASGN MEDICAL ISOLATION
01099678	GONZALES,LIBRADO	S3	H	G2	C 09-035B	UNASGN MEDICAL
01586799	GONZALEZ,JUAN JOSE	S3	H	G2	C 12-016B	KITCHEN HELPER 1ST
02219042	GONZALEZ,JUAN JOSE	S2	H	OT	TC3-046B	COMMUNITY SERV MAJOR 03 SQ
02281511	GONZALEZ,MANUEL JR	S2	H	G1	E 20-046B	COUNTER ATTENDANT 1ST
01789246	GONZALEZ,RICARDO	S3	H	G2	D 14-036B	UNASGN MEDICAL ISOLATION
01755003	GONZALEZ,RUBEN GUERRERO	S3	H	G2	C 11-051B	WORK SQUAD 04
01605073	GONZALEZ,TOMAS	S3	H	G2	D 13-037B	UNASGN MEDICAL ISOLATION
00525936	GOODEN,JAMES CASH JR	L1	B	OT	TC2-105B	FOLDER LAUNDRY T/C
01947061	GOODRUM,HAROLD GREGORY	S3	A	G2	E 20-047B	JANITOR DORM 1-2
01765981	GOODWIN,IRA	S3	W	G2	B 6-001B	UNASGN MEDICAL
02179848	GORDON,ALFRED JAY	S2	B	OT	TC2-006B	FOLDER LAUNDRY T/C
01544138	GORDON,TONY WALTER	S3	W	G2	D 13-030B	UNASGN MEDICAL ISOLATION
02193732	GRACE,LOGAN THOMAS	S3	W	P7	AP-27B	PROTECT SAFEKEEPING PSK7
01604305	GRAHAM,SAMMIE LEE	S2	B	OT	TC3-026B	JANITOR DORM T/C 1-1
01856055	GRAHAM,TONY JOE	S3	W	G2	E 18-046B	KITCHEN HELPER 1ST
01045754	GRAMMER,ROBERT LEE	S3	W	G2	B 8-054B	LANDSCAPE GARD INSIDE YD SQ 01
01721520	GRANBERRY,VIRGLE WAYNE	S3	W	G2	D 14-039B	UNASGN MEDICAL ISOLATION
01218790	GRAY,ANDREW LEE	S3	B	G2	A 1-047B	I/S MEDICAL SQ 01
02044698	GREEN,BENNIE RAY	L3	B	G2	D 14-032B	UNASGN MEDICAL ISOLATION
02110404	GREEN,CHARLES DILLON	S2	W	OT	TC1-065B	AUTO SERV STATION FARM SHOP
01123004	GREEN,THOMAS EUGENE	S3	W	G2	E 20-001B	JANITOR COMMISSARY 1ST
01027068	GREEN,TONY ALLEN	S2	W	OT	TC1-074B	AUTO SERV STATION FARM SHOP
01994817	GREENROCK,COY	S3	W	G2	E 17-025B	I/S MEDICAL SQ 02
01682428	GREGORICH,PETER	S3	W	G2	E 18-001B	COUNTER ATTENDANT 1ST
01882251	GRIGGS,JEFF WAYNE	S3	W	G2	E 18-015B	BOILER OPERATOR 1ST
01481719	GRIGGS,SHAWN KEVIN	S3	W	G2	E 20-027B	FOLDER LAUNDRY
02092446	GRIMES,ANTHONY	S2	B	OT	TC3-107B	FOLDER LAUNDRY T/C
02296133	GUERRERO,JOE	L1	H	OT	TC1-011B	UNASGN MEDICAL
02275169	GUERRERO,RUBEN ALBERT	S3	H	P7	AS-PR-14B	PROTECT SAFEKEEPING PSK7
02010315	GUIDRY,TERRY GLYNN	S2	W	OT	TC3-106B	FOLDER LAUNDRY T/C
01672020	GULLETT,PHILLIP RANDALL	S3	W	MD	HOSPA-12B	UNASGN MEDICAL
02261216	GUYNES,GERALD EUGENE	S3	W	G2	A 3-024B	UNASGN MEDICAL

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
02031142	HADDOCK,ARCHIE LEE	S4	B	G2	C 10-042B	COUNTER ATTENDANT 2ND
01192265	HALE,SHANE	S3	W	G2	D 15-029B	UNASGN MEDICAL ISOLATION
00611685	HALL,DOUGLAS DONALD	S3	W	MD	HOSP-11B	UNASGN MEDICAL
01259577	HALL,MARVIN FRANK	S2	B	OT	TC2-003B	FOLDER LAUNDRY T/C
02017122	HALL,REGINALD JEROME	S4	B	G2	E 19-071B	COUNTER ATTENDANT 1ST
01866334	HAMILTON,JIMMIE	S3	B	G2	D 16-007B	UNASGN MEDICAL ISOLATION
02186209	HAMILTON,SCOTT	S3	W	G2	D 13-015B	UNASGN MEDICAL ISOLATION
00448409	HAMLIN,HARRY EDWARD JR	S3	W	G2	A 1-043B	UNASGN MEDICAL
01916239	HAMMOND,J L	S3	B	G2	D 14-048B	UNASGN MEDICAL ISOLATION
00604542	HAMMONS,FRANK ELDON	L1	W	G2	C 12-009B	FOLDER LAUNDRY 2ND
02301134	HAMMONS,RUSSELL	L1	W	G2	D 14-051B	UNASGN MEDICAL ISOLATION
01352024	HAMPTON,GARY WAYNE	S3	B	G2	B 6-039B	UNASGN MEDICAL
01887233	HAMPTON,HENRY EARL	S3	B	G2	C 12-010B	COUNTER ATTENDANT 2ND
00619860	HANSON,STEVE AARON	S2	W	OT	TC3-094B	WASTEWATER TREAT ATTEND
01058875	HARDEMAN,CLAUDE HENRY	S3	B	G2	B 6-004B	UNASGN MEDICAL
01250639	HARDEMAN,DAVID	S3	B	G2	C 12-001B	JANITOR MEDICAL
01587434	HARE,JIMMY	S3	W	G2	C 11-020B	WORK SQUAD 04
01836273	HARGRAVES,JOSHUA WAYNE	S3	W	G3	A 4-019B	JANITOR BRASS 1-1
02167939	HARGROW,CEDRIC MONTEL	S2	B	OT	TC3-069B	FARM WORKER LIVESTOCK BR
00314681	HARGROW,MARVIN CHARLES	S3	B	G2	B 6-019B	UNASGN MEDICAL
01484027	HARLOW,JON ERIK	S3	W	G2	D 15-020B	UNASGN MEDICAL ISOLATION
02264055	HARPER,CHARLES BOYCE	S3	W	G2	A 2-013B	UNASGN MEDICAL
02104362	HARPER,JAMES SHANNON	S3	W	G2	E 19-028B	GEN CLERK LAUNDRY
02010889	HARRIS,GEORGE	S2	B	G1	D 15-030B	UNASGN MEDICAL ISOLATION
01758425	HARRIS,GREGORY EUGENE	S4	B	G2	D 15-040B	UNASGN MEDICAL ISOLATION
02203361	HARRIS,JACK ANDREW	S2	W	OT	TC3-043B	JANITOR DORM T/C 2-2
01694134	HARRIS,RICHARD	S3	W	G3	A 3-020B	FOLDER LAUNDRY
01104976	HARRIS,TOMMY RAY	S3	W	G2	A 2-002B	UNASGN MEDICAL
00338465	HART,CHARLES EDWARD	S3	B	G2	B 7-004B	UNASGN MEDICAL
01295079	HARTLESS,JERRY DON	S3	W	G2	A 3-033B	I/S MEDICAL SQ 02
01898214	HATCHER,JOSHUA WAYNE	S2	W	OT	TC1-058B	MAINTENANCE MECHANIC OUTSIDE
01156043	HAWKINS,CHARLES	L1	B	G2	C 09-031B	KITCHEN HELPER 1ST
02089918	HAWTHORNE,RICKY LAMAR	L2	B	G2	E 19-041B	UNASGN MEDICAL
00263672	HAY,HERBERT DARRELL	L1	W	G2	A 1-038B	UNASGN MEDICAL
01465880	HAYDEN,BRADLEY CHARLES	S3	W	MD	HOSPA-12B	UNASGN MEDICAL
02003514	HAYDEN,ZAMONE OBRYAN	S4	B	G2	D 14-025B	UNASGN MEDICAL ISOLATION
00490302	HAYES,ARTHUR LEE	S2	B	OT	TC1-100B	CLOTHING ATTENDANT OFFICER
02198534	HAYNES,GARY WAYNE	S4	W	G2	D 13-020B	UNASGN MEDICAL ISOLATION
02116908	HAYWARD,TRAVIS JAY	S2	W	OT	TC3-023B	WASTEWATER TREAT ATTEND
02013764	HEAD,JOSHUA	S3	B	G2	E 20-085B	TOOL CRIB ATTENDANT VOC
02135560	HEALY,MICHAEL PATRICK SR	S3	W	G2	D 14-015B	UNASGN MEDICAL ISOLATION
01194284	HEARD,LINDY G	S2	W	OT	TC3-021B	UNASGN MEDICAL
01397558	HEINY,WILLIAM ALLEN	S3	W	G2	E 20-024B	FOLDER LAUNDRY
02262482	HELMS,DANNY EDWIN	S3	W	G2	B 6-037B	UNASGN MEDICAL
02194062	HEMPHILL,PERRY	S3	B	G2	C 11-027B	SAFETY TECH FIREWATCH KIT 1ST
01682452	HENCHEL,CHARLES ROBERT JR	S3	W	G2	D 13-010B	UNASGN MEDICAL ISOLATION
02015030	HENDERSON,GEORGE	S3	W	G2	A 1-029B	UNASGN MEDICAL
01709642	HENDERSON,WILLIAM JOHN	S2	W	OT	TC3-083B	BOILER OPERATOR 1ST
02066229	HENRY,RODNEY DARRELL	S2	B	OT	TC1-076B	UNASGN MEDICAL
01612278	HENRY,THELONIOUS	S3	B	G2	D 13-014B	UNASGN MEDICAL ISOLATION
00677275	HENSON,TOMMY CHARLES	S3	B	G2	C 11-030B	I/S MEDICAL SQ 01
01673617	HERNANDEZ,ARMANDO	L1	H	G2	C 11-013B	JANITOR DORM 2-2
02251269	HERNANDEZ,DAVID	S3	H	G2	B 6-050B	I/S MEDICAL SQ 01

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01868851	HERNANDEZ,EDUARDO MORA	S3	H	G2	C 10-054B	WORK SQUAD 02
01531454	HERNANDEZ,GUADALUPE	S3	H	G2	E 20-033B	GEN CLERK CRAFTSHOP
01209534	HERNANDEZ,ISIDRO	S3	H	G2	E 19-002B	I/S MEDICAL SQ 02
01985119	HERNANDEZ,JOSEPH MARTIN	S2	H	OT	TC3-032B	JANITOR FRONT OFC T/C 1ST
01515902	HERNANDEZ,LUPE RENE	S3	H	G2	E 18-007B	KITCHEN HELPER 1ST
01396430	HEROD,ISHMAEL III	S3	B	G2	E 20-090B	KITCHEN HELPER 1ST
01575832	HIBBARD,HOYT MANNING	S3	W	G2	E 18-021B	KITCHEN HELPER 1ST
00477579	HIBBLER,BILLY JOE	S2	W	G1	D 13-011B	UNASGN MEDICAL ISOLATION
02094058	HICKMAN,SAMUEL GLENN	S2	W	OT	TC3-103B	FOLDER LAUNDRY T/C
02047147	HIGBY,DENNIS	S2	W	OT	TC1-062B	FOLDER LAUNDRY T/C
01070874	HIGGINS,ANDIE M	S3	B	G2	C 09-052B	SAFETY TECH FIREWATCH KIT 1ST
02101351	HIGGINS,CODY VANCE	S3	W	G2	D 13-043B	UNASGN MEDICAL ISOLATION
01056936	HIGHTOWER,JAMES LEE	S3	W	G2	A 1-042B	I/S MEDICAL SQ 01
00662524	HILL,CALVIN	S2	B	G1	E 20-014B	UNASGN MEDICAL
01971776	HILL,JASON KARL	S2	W	OT	TC1-089B	JANITOR FRONT OFC T/C 2ND
01930337	HILL,LAWRENCE	S3	B	G2	D 13-047B	UNASGN MEDICAL ISOLATION
01930545	HILL,MATTHEW THOMAS	S2	W	OT	TC3-063B	WASTEWATER TREAT ATTEND
01633302	HILL,RICKY DARRELL	S3	B	G2	E 20-069B	COUNTER ATTENDANT 3RD
02144208	HINDS,RICHARD ALLEN	S3	W	G2	D 13-019B	UNASGN MEDICAL ISOLATION
01712441	HINES,CHARLES WAYNE	S3	W	G2	C 09-049B	FOLDER LAUNDRY
01820103	HINSON,ADOLFO	S3	W	G2	B 6-054B	JANITOR DORM 2-1
02201280	HOEFT,GLENN EDWARD	S2	W	OT	TC3-056B	COMMUNITY SERV MAJOR 03 SQ
02043467	HOGAN,DONALD EUGENE	S3	W	G2	A 1-018B	UNASGN MEDICAL
02085532	HOLGUIN,ENRIQUE	S3	H	G2	C 12-012B	UNASGN MEDICAL
00690345	HOLIDAY,BENNY DON	S2	W	OT	TC1-048B	UNASGN MEDICAL
00633652	HOLLAND,RAY CHARLES	S2	B	OT	TC2-021B	KITCHEN HELPER 1ST T/C
01136816	HOLLOWAY,DANNY LEE II	S3	W	G2	E 20-089B	JANITOR CLEAN ISSUE 1ST
01640416	HOLLOWAY,JIMMY DALE	S3	W	G2	B 6-036B	UNASGN MEDICAL
01682450	HOLMAN,JAMIE RAY	S3	W	G2	E 20-083B	TRASH COLLECTOR UNIT
02024357	HOLMES,DAVID LEON	S2	B	OT	TC3-010B	JANITOR DORM T/C 1-2
01537680	HONEA,JAMES RAY	S3	W	G2	B 7-038B	UNASGN MEDICAL
02243065	HOOD,PATRICK DEON	S2	B	OT	TC1-055B	JANITOR DORM T/C 2-2
02179950	HOOPER,JOSEPH CLIFFORD	S2	W	OT	TC1-026B	WELDER COMB FARM SHOP
01484370	HORACE,JOE FRANK SR	S3	B	G2	A 2-010B	I/S MEDICAL SQ 02
02112310	HOWARD,DYWANE	S4	B	G2	C 10-046B	CLOTHING EXCHANGER 1ST
01550104	HUBBARD,TERRY	S3	B	G2	C 09-053B	UNASGN MEDICAL
00701453	HUCKABY,TERRY CLAYTON	S3	W	G2	C 09-038B	DRYING MACH OPR 2ND
01910618	HUERTA,CARLOS SANTOS	S3	H	G2	E 19-043B	JANITOR DORM 1-2
02145568	HUGHES,TONY RAY	S2	W	OT	TC1-051B	FOLDER LAUNDRY T/C
02043479	HUKILL,SAMUEL WADE	S3	W	G2	D 13-042B	UNASGN MEDICAL ISOLATION
01591826	HUSSMAN,CLARK KEN	S2	W	OT	TC3-099B	GROUNDSKEEPER T/C SQUAD
02179176	ISAACS,CHAD A	S2	W	OT	TC3-078B	ANIMAL CARETAKER KENNEL
01276213	JACKSON,ANTHONY SENNETTE	S2	B	OT	TC2-101B	JANITOR DORM T/C 1-2
02000810	JACKSON,ARBRICK RENARD	S2	B	OT	TC1-079B	CARPENTER MAINTENANCE
01848424	JACKSON,BURNELL	S2	B	OT	TC1-003B	FOLDER LAUNDRY T/C
01637511	JACKSON,ELBERT JR	L1	B	G2	B 5-031B	UNASGN MEDICAL
01933528	JACKSON,JAMES H	S3	W	G2	D 15-036B	UNASGN MEDICAL ISOLATION
02067705	JACKSON,RONALD	S3	B	G2	D 14-038B	UNASGN MEDICAL ISOLATION
00775076	JACOBS,WILLIAM RAY	S3	W	G2	B 8-011B	FOLDER LAUNDRY
01566629	JAIME,LORENZO BRITO	S3	H	G2	B 5-026B	UNASGN MEDICAL
02135189	JAIMES,GERMAN	S2	H	OT	TC3-036B	COMMUNITY SERV MAJOR 01 SQ
02099038	JAMES,DEAN JOHNSON	S3	B	G3	D 14-022B	UNASGN MEDICAL ISOLATION
01778941	JAMES,RICHARD DALE	S3	W	G2	C 10-015B	I/S MEDICAL SQ 02

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
02069803	JARAMILLO,MAURICIO JR	S2	H	OT	TC2-083B	COMMUNITY SERV MAJOR 01 SQ
00468760	JAXSON,RICHARD	S3	W	G2	A 4-002B	UNASGN MEDICAL
02240044	JAY,JIMMY LEE	S2	W	OT	TC1-087B	JANITOR DORM T/C 2-1
01021609	JAYROE,CHARLES LUTHER	S4	W	G2	A 3-010B	UNASGN MEDICAL
02000217	JEFFERSON,DARYL MAURICE	L2	B	G3	D 14-001B	UNASGN MEDICAL ISOLATION
02221425	JEFFERSON,HAROLD	S3	B	G2	C 10-039B	FOLDER LAUNDRY
01586802	JILEK,BRANDON KARL	S2	W	OT	TC3-098B	UNASGN MEDICAL
01961250	JIMENEZ,SANTIAGO LARA	S3	H	G2	C 12-030B	UNASGN MEDICAL
00768868	JOHNSON,ALVIN RAY	S4	W	G2	A 1-039B	UNASGN MEDICAL
02178610	JOHNSON,ANDREW	S2	W	OT	TC1-047B	TRACTOR OPERATOR
02186763	JOHNSON,BENJAMIN TODD	S2	W	OT	TC1-054B	GEN CLERK AGRICULTURE
02122162	JOHNSON,CHRISTOPHER DEAN	S2	W	OT	TC3-047B	WARESHOUSEMAN SURPLUS WRHSE
02024080	JOHNSON,DANIEL EDWARD	S4	B	G2	E 19-078B	COUNTER ATTENDANT 1ST
01988907	JOHNSON,HERMAN WAYNE	S3	B	G2	C 10-027B	UNASGN MEDICAL
02053800	JOHNSON,IRA JESSIE	L1	B	G2	B 7-001B	UNASGN MEDICAL
02274683	JOHNSON,JAMES RANDOLPH	S3	W	G2	C 12-037B	UNASGN MEDICAL
00355256	JOHNSON,KEVIN ORLANDO	S3	B	G2	B 8-007B	FOLDER LAUNDRY
00495417	JOHNSON,LINCOLN	S2	B	OT	TC1-063B	FOLDER LAUNDRY T/C
01705234	JOHNSON,MARQUETTE BERNARD	S2	B	OT	TC1-060B	WARESHOUSEMAN SURPLUS WRHSE
00677953	JOHNSON,MICHAEL CARL	S3	B	G2	C 12-052B	COOK 1ST
00433363	JOHNSON,PAUL LAWRENCE	S2	B	OT	TC3-064B	WARESHOUSEMAN SURPLUS WRHSE
01750800	JOHNSON,RONNIE NORMAN III	S2	B	OT	TC2-107B	COOK T/C
01190942	JOHNSON,RUSTY RANDALL	S3	W	G2	B 8-046B	PRESSER LAUNDRY
00729990	JOHNSON,STACY LEE	S3	W	G2	EDUC-003B	UNASGN PENDING ASSIGNMENT
02038326	JOHNSON,WILLIAM CLYDE JR	S3	B	G2	B 8-052B	JANITOR DORM 1-2
01072976	JOHNSTON,JACK ALLEN	S3	W	G2	D 15-012B	UNASGN MEDICAL ISOLATION
01591295	JOHUNKIN,TRACY LAMONT	S3	B	G2	E 18-029B	FIELD MINISTER
01922393	JONES,EARNEST JR	S3	W	G2	C 09-007B	UNASGN MEDICAL
00845067	JONES,JOHN EDWIN	S3	W	G2	A 1-045B	UNASGN MEDICAL
01171680	JONES,JOHNNY	S3	B	G2	D 13-022B	UNASGN MEDICAL ISOLATION
01777657	JONES,KELVIN	S4	B	G2	C 10-030B	I/S MEDICAL SQ 01
01798881	JONES,LLOYD	S3	B	G2	D 15-004B	UNASGN MEDICAL ISOLATION
01040320	JONES,MARVIN ANDRE	S3	B	G2	A 4-020B	JANITOR DORM 1-2
02098676	JONES,MARVIN EARL	S2	B	OT	TC1-067B	KITCHEN HELPER 1ST T/C
01904327	JONES,MELVIN	S3	B	G2	B 7-050B	JANITOR DORM 1-2
00743334	JONES,RAYMOND T	S3	B	G2	E 19-019B	UNASGN MEDICAL
00815868	JONES,ROLAND LEE	S4	B	G2	D 13-050B	UNASGN MEDICAL ISOLATION
00272628	JONES,WILBUR JR	S3	B	G2	B 5-046B	I/S MEDICAL SQ 01
01313177	JORDAN,ORLANDO T	S3	B	G2	C 11-044B	I/S MEDICAL SQ 02
01612696	JORDAN,RUSSELL JERMAINE	S3	B	G2	E 18-042B	KITCHEN HELPER 1ST
01078890	JOSEY,ROBERT GENE	S3	W	G2	E 19-034B	UNASGN MEDICAL
01680653	JUAREZ,HECTOR	S3	H	G2	C 10-049B	WORK SQUAD 01
02246065	KAPLAN,SETH AARON	S3	W	G2	C 12-045B	FOLDER LAUNDRY
01842776	KARDOS,DERICK JON	S3	W	G3	D 15-037B	UNASGN MEDICAL ISOLATION
02266166	KEEL,DOUGLAS EDWARD	S3	W	G2	B 8-053B	UNASGN MEDICAL
01939720	KELLY,JEFFREY SCOTT	S2	W	OT	TC3-097B	ALTERATION TAILOR T/C
00792063	KENDRICK,JOHN WESLEY	S3	B	G2	B 8-050B	I/S MEDICAL SQ 02
02025055	KENNEDY,ROCKLINE GEORGE	S3	W	G2	D 13-027B	UNASGN MEDICAL ISOLATION
02057182	KESSLER,PETER THOMAS	S2	W	OT	TC2-036B	FOLDER LAUNDRY T/C
00859666	KESTER,JACK ALAN	S3	W	G2	D 14-040B	UNASGN MEDICAL ISOLATION
00679530	KHALAF,MURTAJA	S3	W	G2	EDUC-009B	UNASGN PENDING ASSIGNMENT
01597761	KILE,EDWARD MACK	S3	W	G2	A 3-034B	I/S MEDICAL SQ 02
01136410	KING,PHILLIP ST.AUBURN	S3	B	G2	E 20-079B	COOK 1ST

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00516700	KING,RICHARD ELVIN	S3	W	G2	E 18-002B	JANITOR DORM 1-1
01150990	KINHULT,KEVIN	S3	W	G2	D 14-028B	UNASGN MEDICAL ISOLATION
01166698	KIRKWOOD,JAMES ANTHONY	S2	B	OT	TC3-027B	FOLDER LAUNDRY T/C
02105169	KISSNER,GARY WAYNE	S3	W	G2	D 15-002B	UNASGN MEDICAL ISOLATION
00704214	KITCHEN,THOMAS CARTER	S3	W	G2	B 7-027B	UNASGN MEDICAL
02236155	KNATCHER,DONALD REED	S2	W	OT	TC3-052B	KITCHEN HELPER 1ST T/C
02044608	KNIGHT,JOSEPH CISCO	S3	W	G3	A 3-018B	UNASGN MEDICAL
01731817	KNOWLES,KENNETH RONALD	S3	W	G3	E 19-011B	I/S MEDICAL SQ 02
01937795	KOELLIKER,TERRY LEE	S3	W	G2	B 5-009B	UNASGN MEDICAL
02188665	KOJIS,DALE EDWARD	S2	W	OT	TC1-088B	FENCE ERECTOR
00383524	KYLES,LEONARD WAYNE	S2	B	OT	TC2-035B	KITCHEN HELPER 1ST T/C
01597506	LAMPIN,IRA DELL	S3	W	G2	B 6-047B	I/S MEDICAL SQ 01
01774742	LANE,FREDERICK	S3	B	G2	C 10-001B	I/S MEDICAL SQ 02
01512816	LANGFORD,CHARLES EDWARD	S4	W	G2	D 13-002B	UNASGN MEDICAL ISOLATION
00562501	LARRY,NEAL DWIGHT	S3	B	G2	B 6-017B	UNASGN MEDICAL
01584341	LASATER,CURTIS CHARLES	S3	W	G2	E 20-059B	COOK 1ST
02102548	LAWLESS,KELLY MICHAEL	S3	W	G2	B 5-047B	I/S MEDICAL SQ 01
01945154	LAYTON,ABEL OZUNA	S3	H	G3	D 14-009B	UNASGN MEDICAL ISOLATION
01665800	LEAGUE,MICHAEL DAVID	S3	W	G2	E 18-014B	KITCHEN HELPER 1ST
00640741	LEBLANC,JERRY L	S3	B	G2	EDUC-019B	UNASGN PENDING ASSIGNMENT
00482397	LEDOUX,JOHN ELDEN	S3	W	G2	D 14-041B	UNASGN MEDICAL ISOLATION
02068090	LEE,JAMES CHRISTOPHER	S2	W	OT	TC1-015B	UNASGN MEDICAL
02177193	LEE,KENNETH HOWARD	L1	W	G2	B 7-014B	FOLDER LAUNDRY
02262432	LEMING,ALLEN LEROY	S3	W	G2	C 09-028B	JANITOR DORM 1-2
01662856	LEMMONS,RUBIN	S3	W	G2	A 1-022B	UNASGN MEDICAL
01644156	LENOX,ROBERT WILLARD	S3	W	G2	A 1-025B	UNASGN MEDICAL
02077134	LEWIS,DERRICK DEWAYNE	S2	B	OT	TC3-058B	MAINTENANCE MECHANIC OUTSIDE
01988716	LEWIS,LONNIE JAMES	S3	B	G2	A 2-017B	UNASGN MEDICAL
02082130	LEWIS,MICHAEL DARREN	S3	W	G3	D 13-035B	UNASGN MEDICAL ISOLATION
00411948	LEYVAS,DAVID	S3	H	G2	B 6-003B	UNASGN MEDICAL
01972430	LHERAULT,CHARLES	S3	W	G2	E 18-024B	JANITOR DORM 1-2
02027631	LIENDO,JOE MENCHACA	S4	H	G2	C 10-020B	WORK SQUAD 01
01873539	LIGGETT,ROBERT LYNN	S3	W	G2	B 7-048B	I/S MEDICAL SQ 01
01890362	LIMONES,RICHARDO L	S3	H	G2	B 5-048B	JANITOR DORM 2-1
00562909	LINWOOD,JOHNNY	S3	B	G2	B 8-034B	FOLDER LAUNDRY
02114919	LISCOTTI,DONALD EUGENE	S3	W	G2	D 13-005B	UNASGN MEDICAL ISOLATION
01885621	LITTON,THOMAS CARL	S3	W	G2	E 10-026B	BOILER OPERATOR 2ND
00523121	LIVINGS,CURTIS JOSEPH	S3	B	G2	C 09-003B	UNASGN MEDICAL
01416074	LIVINGSTON,DARRELL GLENN	S3	W	G2	D 14-042B	UNASGN MEDICAL ISOLATION
01258902	LIVINGSTON,DERWIN DALE	S4	W	G2	A 3-028B	UNASGN MEDICAL
02002926	LLOYD,JAMES BRIT	L3	W	G2	D 15-041B	UNASGN MEDICAL ISOLATION
01341519	LOBOS,MANUEL ANTONIO	S3	H	G2	C 09-034B	UNASGN MEDICAL
02167982	LOCKWOOD,TONY JOSEPH	S2	B	OT	TC3-074B	JANITOR DORM T/C 1-1
02004835	LOFTIS,GORDON	S3	W	G2	C 09-018B	I/S MEDICAL SQ 02
01014927	LONG,JOE CLARK	S3	W	G2	E 20-039B	ARTIST UNIT
01731111	LONG,TROY FRANKLIN III	S3	W	G2	C 12-047B	I/S MEDICAL SQ 02
00530121	LOPEZ,JOSE	S3	H	G2	C 10-018B	WASHING MACHINE OPERATOR
02158228	LOPEZ,PEDRO JR	S2	H	G2	E 20-011B	KITCHEN HELPER 1ST
01937119	LOPEZ,RAY JEWEL LEE	S3	H	G2	E 18-027B	KITCHEN HELPER 1ST
00540615	LOPEZ,RAYMOND AYALA JR	S2	H	OT	TC1-053B	FARM WORKER HOG FEEDER SLAB
01673749	LOPEZ,RICHARD	S3	H	G2	C 10-021B	DRYING MACH OPR 1ST
01647073	LOTT,CHARLES A	L1	B	G2	D 15-007B	UNASGN MEDICAL ISOLATION
01801328	LOWERY,JAMES STEVEN	S3	W	G2	E 18-012B	ICE & WATER DISTRIBUTOR 2-2

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00624221	LOYD,HARVEY GENE	S3	W	G2	D 13-038B	UNASGN MEDICAL ISOLATION
01588605	LUNA,JOE ALEXANDER	S4	H	G2	E 19-081B	FOLDER LAUNDRY
02230636	LUNA,VICTOR ALFONSO	S3	H	G2	E 18-033B	KITCHEN HELPER 2ND
01338074	LUNSFORD,EUGENE	S3	B	G2	B 5-022B	JANITOR DORM 2-1
00380161	LYLES,LELAND	S3	W	G2	EDUC-005B	UNASGN PENDING ASSIGNMENT
01463298	LYON,EDWIN KENNER	S3	W	G2	A 3-044B	UNASGN MEDICAL
01840122	LYTE,SAMUEL LEE	S3	B	G2	A 1-040B	UNASGN MEDICAL
02068206	MACHAC,BILLY JOE	S2	W	OT	TC2-009B	KITCHEN HELPER 1ST T/C
01817825	MACHICEK,KENNETH ROY	S3	W	G2	E 19-092B	JANITOR DORM 1-1
02071798	MACK,GEOFFREY SCOT	S2	B	OT	TC2-096B	KITCHEN HELPER 1ST T/C
00528937	MADRID,ANTONIO	S3	H	G2	B 5-052B	UNASGN MEDICAL
02231107	MAGDALENO,MODESTO	S3	H	G2	B 5-021B	UNASGN MEDICAL
01671318	MAGUREGUI,HUMBERTO	S3	H	G2	D 14-013B	UNASGN MEDICAL ISOLATION
02013323	MALDONADO,ELISEO	S3	H	G2	A 1-010B	I/S MEDICAL SQ 01
01504198	MALDONADO,JULIAN	S3	H	G2	A 1-031B	UNASGN MEDICAL
02243952	MALONE,JIMMY RAY	S3	W	G2	B 6-041B	UNASGN MEDICAL
00375824	MALONE,MYERS NELSON	S3	W	G2	D 15-046B	UNASGN MEDICAL ISOLATION
01850192	MARIN,MICHAEL JOHN	S2	H	OT	TC1-061B	FOLDER LAUNDRY T/C
01144331	MARRS,JERRY MICHAEL	S3	W	G2	E 17-010B	UNASGN MEDICAL
02045811	MARSH,COY BOYD	S3	W	G2	A 1-027B	UNASGN MEDICAL
01439636	MARTIN,BILLY JOE	S3	W	G2	D 14-049B	UNASGN MEDICAL ISOLATION
01989549	MARTIN,BOBBY GENE	S3	W	G3	A 3-045B	UNASGN MEDICAL
00356835	MARTIN,EARL CALVIN	S3	B	G2	D 15-001B	UNASGN MEDICAL ISOLATION
01877626	MARTINEZ,BRIAN	L1	H	G2	AS-PR-09B	UNASGN PENDING ASSIGNMENT
01028337	MARTINEZ,FERNANDO	S3	H	G2	B 7-023B	I/S MEDICAL SQ 01
01439289	MARTINEZ,JAMES RAY	S3	H	P7	AP-20B	PROTECT SAFEKEEPING PSK7
01890740	MARTINEZ,JOHN ANTHONY	S3	H	G2	D 13-021B	UNASGN MEDICAL ISOLATION
01892149	MARTINEZ,ORLANDO	S3	H	G3	D 14-037B	UNASGN MEDICAL ISOLATION
01700457	MARTINEZ,PABLO MENDOZA	S3	H	G2	B 8-037B	UNASGN MEDICAL
01897471	MARTINEZ,RAUL	S3	H	G2	E 19-045B	JANITOR DORM 1-1
02279579	MARTINEZ,RODOLFO PEREZ	S2	H	OT	TC2-095B	MAINTENANCE MECHANIC OUTSIDE
02253944	MARTSOLF,STEVEN LEROY	S3	W	G2	A 3-040B	FOLDER LAUNDRY
00736893	MASON,CHARLES RAY	S3	B	G2	A 1-054B	UNASGN MEDICAL
02166358	MASON,DAVID MICHAEL	S2	W	OT	TC2-075B	JANITOR DORM T/C 2-1
02232194	MATTHEWS,LARRY GLENN	S3	W	P7	AP-23B	PROTECT SAFEKEEPING PSK7
01989524	MAYBERRY,BRETT ALLEN	S2	W	OT	TC2-097B	FARM WORKER LIVESTOCK BR
01911706	MAYFIELD,PERRY ELLIS	S3	W	G2	E 19-038B	SAFETY TECH FIREWATCH KIT 1ST
00527684	MAYFIELD,RICHARD LEE	S3	W	G2	D 13-040B	UNASGN MEDICAL ISOLATION
02012430	MAYO,PAUL	S3	W	G3	A 4-018B	UNASGN MEDICAL
01034318	MAYS,HARVEY	S3	W	P7	AP-25B	PROTECT SAFEKEEPING PSK7
01867724	MCCLURE,TRENT JUSTIN	S3	W	G2	D 13-003B	UNASGN MEDICAL ISOLATION
01557593	MCCRARY,RICHARD LEE	S4	W	G3	D 14-005B	UNASGN MEDICAL ISOLATION
00627165	MCCRORY,JOHN WILLIAM	S3	W	G2	B 7-009B	I/S MEDICAL SQ 01
02165908	MCDONALD,PATRICK	S3	B	G2	C 10-014B	FOLDER LAUNDRY
02206741	MCDONALD,RONNIE LYNN	S2	W	OT	TC2-067B	KITCHEN HELPER 1ST T/C
01641812	MCDOW,JAMES EDDIE	L1	B	MD	HOSPA-12B	UNASGN MEDICAL
01863881	MCFAIL,KENNETH LEE	S2	B	OT	TC1-066B	FOLDER LAUNDRY T/C
01934678	MCFARLIN,DRAYLON SHAVOY	S2	B	OT	TC2-066B	MAINTENANCE MECHANIC OUTSIDE
01130119	MCGEE,ROTOLET	S3	B	G2	E 20-042B	FIELD MINISTER
02077478	MCGRAW,MICHAEL GARNET	S3	W	G2	C 10-011B	JANITOR DORM 1-1
01841949	MCKEE,RONNIE DWAYNE	S2	B	OT	TC2-030B	BOOTBLACK 2ND
00890302	MCLAIN,PRESTON MONROE	S3	W	G2	E 19-014B	UNASGN MEDICAL
02232937	MCLEAN,PAUL EDWARD	S2	B	OT	TC1-035B	COOK T/C

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01131996	MCMICHAEL,JAMES	S3	W	G2	D 14-044B	UNASGN MEDICAL ISOLATION
01435368	MCPHERSON,HARRY DALE	S3	W	G2	C 12-014B	I/S MEDICAL SQ 01
00587502	MCPHERSON,LARRY EUGENE	S3	W	G2	C 12-005B	I/S MEDICAL SQ 01
02108140	MCPHERSON,WILLIAM DAVID	S2	W	OT	TC2-028B	TRACTOR OPERATOR BR
01738590	MEDELLIN,MANUEL JR	S4	H	G2	C 12-015B	JANITOR DORM 1-2
01918579	MEIBURG,RANDY PAUL	S3	W	G2	A 2-021B	UNASGN MEDICAL
02133546	MENDEZ,JOSE JR	S3	H	G2	C 11-017B	UNASGN MEDICAL
01987694	MENDEZ,RAFAEL TELLEZ	S3	H	G3	A 3-025B	JANITOR DORM 1-1
01811796	MENDOZA,ADRIAN	S3	H	G2	D 14-030B	UNASGN MEDICAL ISOLATION
01496625	MERCER,ROY LYNN	L1	W	G2	C 11-035B	I/S MEDICAL SQ 01
00663111	MERRIMAN,CHARLES E JR	S3	W	G2	E 19-088B	I/S MEDICAL SQ 02
01834569	MIJAN,RAUL ALVAREZ	L3	B	G2	A 3-030B	I/S MEDICAL SQ 02
01870425	MILAM,RAYMOND LLOYDE	S2	W	OT	TC3-005B	WELDER COMB FARM SHOP
01973061	MILES,WESLEY LYNN	S2	W	OT	TC2-086B	FARM EQUIPMENT MECHANIC I BR
01891827	MILLER,ANTHONY JOSEPH	S4	W	G3	D 14-011B	UNASGN MEDICAL ISOLATION
01939516	MILLER,ARTHUR FRANKLIN JR	S3	W	G2	A 1-014B	UNASGN MEDICAL
01942044	MILLER,CHARLES RAY	S3	W	G2	B 7-011B	UNASGN MEDICAL
02049145	MILLER,DEVIN HOLLIS	S3	W	G2	D 13-029B	UNASGN MEDICAL ISOLATION
00640039	MILLER,JEFFERY MANTRUE	S4	B	G2	E 19-033B	I/S MEDICAL SQ 01
02221605	MILLER,JOHNNY WAYNE	S2	W	OT	TC3-085B	FOLDER LAUNDRY T/C
00829403	MILLER,ROBERT ANTHONY	S3	W	G2	E 19-012B	UNASGN MEDICAL
01345621	MILLER,RUSSELL LEE	S2	W	OT	TC3-084B	HEAT AND AC REPAIR
02178462	MILLS,BRANDON	S2	B	OT	TC2-072B	KITCHEN HELPER 1ST T/C
02302629	MINTON,BRIAN ALBERT	L1	W	OT	TC1-057B	JANITOR DORM T/C 1-2
02122121	MITCHELL,CHARLES HARRY JR	S3	W	G3	B 6-051B	UNASGN MEDICAL
00767878	MITCHELL,CRAIG EDWARD	S3	W	G2	B 7-013B	FOLDER LAUNDRY
02122155	MITCHELL,DAVID EARL JR	S3	B	G2	C 12-034B	UNASGN MEDICAL
02048321	MITCHELL,GARY LYNN	S3	W	G2	B 5-005B	COOK 1ST
01950339	MOLDER,CALVIN BURRELL	S3	W	G2	E 19-032B	UNASGN MEDICAL
01491019	MOLETT,JOHN HENRY	S3	B	G2	A 3-048B	UNASGN MEDICAL
02269356	MOLLENHOUR,JAMES JR	S2	W	OT	TC3-087B	CLOTHING ATTENDANT OFFICER
01475162	MONDARY,CHARLES MICHAEL	S3	W	G2	EDUC-026B	UNASGN PENDING ASSIGNMENT
01871824	MONTANEZ,SAMUEL SOTELO	S3	H	G2	C 12-036B	I/S MEDICAL SQ 01
02154008	MONTEZ,ALBERT	S2	H	OT	TC1-071B	HARVEST WORKER, VEGETABLE
02114696	MONTEZ,RYAN	S3	H	G2	A 2-027B	UNASGN MEDICAL
01518871	MOORE,GENE EVERETT	S3	W	G2	A 3-039B	UNASGN MEDICAL
02028926	MOORE,HAROLD MICHAEL	S3	W	G2	B 6-046B	UNASGN MEDICAL
02164088	MOORE,JAMES HENRY JR	S2	W	OT	TC2-037B	LANDSCAPE GARDENER FARM SHOP
02257680	MOORE,MICHAEL JR	S2	W	OT	TC1-031B	FARM WORKER HOG FEEDER SLAB
00662174	MOORE,ROGER O	S3	B	MD	HOSPA-12B	UNASGN MEDICAL
01767579	MOORE,TRACY LYNN	S3	W	G2	E 20-066B	ICE & WATER DISTRIBUTOR 1-1
00675565	MORALES,DAVID	S3	H	G2	C 11-033B	FOLDER LAUNDRY
01293696	MORALES,JOSE	S4	H	G2	D 15-026B	UNASGN MEDICAL ISOLATION
01846875	MORALES,SOTERO	S2	H	OT	TC2-089B	FARM EQUIPMENT MECHANIC I
01977149	MORENO,MARCOS GABRIEL	L1	H	G2	AS-PR-12B	UNASGN MEDICAL ISOLATION
01673609	MORENO,MICHAEL ANTHONY	S3	H	G2	E 18-036B	COOK 1ST
02197801	MORGAN,SHANNON MYRICK	S2	W	OT	TC2-091B	KITCHEN HELPER 1ST T/C
00507853	MORIN,RICHARD	S2	H	OT	TC1-017B	JANITOR BACKGATE
01157112	MORPHIS,DAVID BRIAN	S3	W	G3	A 3-026B	UNASGN MEDICAL
02195308	MORRIS,BRODERICK RAY	S2	B	OT	TC3-053B	JANITOR DORM T/C 1-2
02198415	MORRIS,CHARLES EDWARD	S2	B	OT	TC2-017B	FOLDER LAUNDRY T/C
01462354	MORRIS,MICHAEL DAVID	S3	W	G2	C 12-007B	COUNTER ATTENDANT 3RD
00534036	MORRISON,WINFRED BERNARD	S3	B	G2	C 11-008B	WASHING MACH OPR 2ND

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01967236	MORTON,KIRK EDWARD	S3	W	G2	E 19-087B	WORK SQUAD 03
02153070	MOSS,CARL VERNON	S2	W	OT	TC1-094B	ANIMAL CARETAKER KENNEL
00599130	MOUTON,NATHANIEL LOUIS	S3	W	G2	A 1-044B	UNASGN MEDICAL
01359834	MOYA,JOSE ANTONIO	S3	H	G2	B 5-027B	UNASGN MEDICAL
02075342	MOYER,DON WAYNE	S2	W	OT	TC1-075B	FARM EQUIPMENT MECHANIC I
01129168	MOYERS,MICHAEL DAN	L1	W	G2	A 3-006B	I/S MEDICAL SQ 02
01578424	MOZINGO,JOHNNY WALTER	S3	W	G2	E 20-063B	KITCHEN HELPER 1ST
00402120	MUDGE,JOHN BARRY	S3	W	G2	B 5-029B	UNASGN MEDICAL
01455707	MUNIZ,RUBEN	S3	H	G2	E 19-049B	I/S MEDICAL SQ 01
02121202	MUNOZ,LORENZO MORENO	S3	H	G2	C 09-005B	I/S MEDICAL SQ 02
00542510	MURPHY,PATRICK O'NEAL	S3	B	G2	B 7-005B	UNASGN MEDICAL
01999776	MURTAGH,RODNEY JAMES SR	S3	W	G2	D 15-022B	UNASGN MEDICAL ISOLATION
01354925	MYERS,EARL	S3	H	G2	B 5-020B	I/S MEDICAL SQ 02
01699635	NANEZ,JESSE JIMMY	S3	H	G2	B 6-021B	JANITOR DORM 1-2
01781342	NAPPER,MICHAEL	S2	W	OT	TC2-032B	WELDER AGRICULTURE BR
01163671	NARANJO,ADAM ALONZO	S3	W	G2	E 20-016B	FOLDER LAUNDRY
01066121	NASH,JIMMY LEE	S2	B	G1	E 20-006B	CLOTHING ATTENDANT OFFICER
02038167	NAVA,GREGORIO HERNANDEZ	S3	H	G3	EDUC-017B	UNASGN PENDING ASSIGNMENT
00644917	NEAL,ROBERT DUANE	S3	W	G2	E 20-044B	BOILER OPERATOR 1ST
02196918	NEILL,CHARLES ANDERSON	S3	W	G2	C 11-011B	COUNTER ATTENDANT 1ST
02187400	NELSON,LESLIE	S3	W	G2	B 8-027B	FOLDER LAUNDRY
01326671	NELSON,REGINALD	S3	B	MD	HOSP-10B	UNASGN PATIENT
00437273	NEVAREZ,DAGOBERTO	L1	H	G2	B 5-028B	JANITOR DORM 2-2
02010759	NEWMAN,ROY GENE	S3	W	G2	D 15-032B	UNASGN MEDICAL ISOLATION
01207933	NEWTON,GLENN	S3	W	G2	E 20-070B	JANITOR COMMISSARY 1ST
01412958	NGUYEN,LINH NHAT	S3	A	G2	D 14-033B	UNASGN MEDICAL ISOLATION
01879355	NGUYEN,LONG	S4	A	G2	C 12-043B	KITCHEN HELPER 1ST
02002334	NICHOLSON,RICHARD JOHN	S3	W	G2	D 13-013B	UNASGN MEDICAL ISOLATION
01093287	NUNAMAKER,DONALD WALTER	S3	W	G2	B 5-024B	FOLDER LAUNDRY
01898405	NUTT,BRYAN RAY	S2	W	OT	TC3-001B	JANITOR FRONT OFFICE 2ND
02178096	NUTTALL,HARLEY GENE	S2	W	OT	TC2-065B	WELDER AGRICULTURE BR
02061910	OAKLEY,TRAVIS JOHN	S3	W	G2	B 6-040B	UNASGN MEDICAL
01571985	ODELL,ROBERT SHANON	S3	W	G2	EDUC-025B	UNASGN PENDING ASSIGNMENT
02107032	ODELL,TIMOTHY EUGENE	S2	W	OT	TC2-098B	FARM EQUIPMENT MECHANIC I BR
01767123	ODOM,RAYMOND KEITH JR	S3	W	G3	D 14-021B	UNASGN MEDICAL ISOLATION
01594763	OLACHIA,AMADO	S3	H	G3	A 3-002B	KITCHEN HELPER 1ST
01211938	ONEAL,MAURICK JERRE	L1	B	G2	E 17-022B	UTILITY SQ CAPTAIN
01842576	ONTIVEROS,AVELARDO	S2	H	OT	TC3-077B	GROUNDSKEEPER O/S YD SQ 02 A
00426047	ORONA,RICHARD VASQUEZ	S3	H	G2	C 12-021B	FOLDER LAUNDRY 2ND
01990569	OROSCO,PEDRO	S3	H	G2	D 15-035B	UNASGN MEDICAL ISOLATION
01541311	OROZCO,JORGE ERASMO	S3	H	G2	E 18-035B	KITCHEN HELPER 2ND
01707458	ORTEGA,NICK ESPINOZA	S3	H	G2	A 1-024B	JANITOR DORM 1-1
00753367	ORTIZ,ANTHONY	S3	H	G2	E 20-004B	COUNTER ATTENDANT 2ND
01779843	ORTIZ,BENITO	S3	H	G2	E 18-032B	KITCHEN HELPER 1ST
01836942	ORY,MICHAEL DAVID	S3	W	G2	C 12-054B	STOCK CLERK KITCHEN 1ST
01676460	OVERTON,SHAUN DAVID	S3	W	G2	E 20-068B	JANITOR CLEAN ISSUE 1ST
01857096	OVERTURF,TIMOTHY DALE	S2	W	OT	TC3-095B	COMMUNITY SERV MAJOR 01 SQ
02023624	PACKARD,OLLIE PAUL	S2	W	OT	TC2-023B	FOLDER LAUNDRY T/C
01365110	PALACIOS,PAUL	S3	H	G2	B 8-018B	UNASGN MEDICAL
00694771	PALMER,CLARENCE	S3	B	G2	A 3-046B	UNASGN MEDICAL
01568299	PALMER,DAN LEE	S3	W	G2	A 2-009B	UNASGN MEDICAL
00538048	PALMORE,ROBERT	S2	W	OT	TC1-018B	TRACTOR OPERATOR
02257955	PARISI,ANTHONY JAMES	S3	W	G2	A 4-027B	UNASGN MEDICAL

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00674610	PARKER,BILLY JACK	S3	W	G2	EDUC-001B	UNASGN PENDING ASSIGNMENT
01902508	PARKER,EDWIN	S3	I	G2	A 1-030B	UNASGN MEDICAL
00678438	PARKER,STEPHEN DWAYNE	S2	W	OT	TC3-100B	ELECTRICIAN
02123502	PARKER,THOMAS WAYNE	S2	W	G1	E 20-026B	KITCHEN HELPER 1ST
01387162	PARMAN,TEDDY LYNN	S3	W	G2	B 5-040B	I/S MEDICAL SQ 01
02130912	PARTIDA,ELLIE JR	S3	H	G2	B 5-037B	UNASGN MEDICAL
01288004	PATTERSON,DALE LEE	S3	W	G2	C 10-005B	JANITOR DORM 2-1
02051387	PATTON,GREGORY EUGENE	L3	B	G2	C 09-019B	JANITOR DORM 2-2
01135013	PATTON,JOHNNY RAY	S2	B	OT	TC3-073B	JANITOR CLEANING SQUAD TC
00483413	PAYNE,GEORGE	S3	B	G2	E 19-072B	FOLDER LAUNDRY
01894856	PAYNE,KENNETH STEVEN	S3	W	G2	E 20-062B	ALTERATION TAILOR
01851223	PEACE,JEFFREY	S2	B	OT	TC2-069B	JANITOR COMMISSARY T/C
01831542	PEEL,RONNIE PAUL	S2	W	OT	TC1-069B	FOLDER LAUNDRY T/C
01289716	PELLOAT,JAMES ALLEN	S3	W	G2	A 3-031B	UNASGN MEDICAL
01767189	PENDLETON,BILLY ALVIN	L1	W	G2	D 14-020B	UNASGN MEDICAL ISOLATION
02282036	PENNINGTON,CARL WAYNE	S2	B	OT	TC1-036B	JANITOR DORM T/C 2-1
02119905	PENNINGTON,RICKEY DWAYNE	S3	W	G2	B 5-054B	UNASGN MEDICAL
00531216	PENNINGTON,THOMAS RAY	S3	B	G2	B 6-022B	FOLDER LAUNDRY 2ND
01960642	PEPPER,JONATHAN D	S3	W	G2	D 15-034B	UNASGN MEDICAL ISOLATION
02255651	PERDOMO-MOREJON,MIGUEL ARMANDO	S3	H	G2	C 09-036B	JANITOR DORM 2-2
01418090	PEREZ,ALBERT R	S3	H	G2	B 5-045B	JANITOR DORM 1-1
01630717	PEREZ,CARLOS ABARCA	S3	H	G2	E 20-031B	JANITOR DORM 2-2
00342946	PERKINS,MELVIN	S3	W	G2	EDUC-011B	UNASGN PENDING ASSIGNMENT
02231702	PERRATTO,BRADLEY	S2	W	OT	TC2-053B	KITCHEN HELPER 1ST T/C
02123392	PERRIO,DARRYL JAMES	S3	W	G2	B 7-040B	UNASGN MEDICAL
01712141	PERRY,BRIAN MITCHELL	S3	W	G2	A 1-021B	UNASGN MEDICAL
01998059	PETERS,ROBERT KENNETH	S3	W	G2	D 13-033B	UNASGN MEDICAL ISOLATION
01448291	PETRALI,RICHARD M	S3	W	G2	C 12-029B	UNASGN MEDICAL
02031797	PETTY,CHRISTIAN	S2	W	OT	TC1-042B	GEN CLERK AGRICULTURE
01931648	PFEIFER,DAVID GEORGE	S3	W	G3	A 3-050B	UNASGN MEDICAL
02090969	PHEA,IRA DEWAYNE	S2	B	OT	TC1-046B	JANITOR FRONT OFC T/C 1ST
02184972	PHILLIPS,BOBBY	S2	B	OT	TC3-092B	JANITOR DORM T/C 2-1
01043007	PHILLIPS,HERMAN	S2	B	G1	E 20-017B	LANDSCAPE GARD INSIDE YD SQ 01
02006521	PIAZZA,ROBERT PETER	S3	W	G2	A 1-016B	I/S MEDICAL SQ 01
02095814	PINON,GILBERT	L1	H	G2	C 10-007B	UTILITY RECREATION YD SQ 1-2
01898277	PINSON,DENNIS RAY	S2	B	OT	TC2-008B	KITCHEN HELPER 1ST T/C
00590699	PIPPIN,WENDELL LEE	S3	W	G2	D 13-009B	UNASGN MEDICAL ISOLATION
01990672	PIZZINI,NICHOLAS GIOVANNE	S2	W	OT	TC3-081B	GEN CLERK MAINTENANCE
00749481	PORTER,ANDREW LEE	S3	B	G2	A 1-005B	UNASGN MEDICAL
01709019	PORTINGA,MARK	S3	W	G2	C 10-052B	UNASGN MEDICAL
00748344	POULOS,ARTHUR	S3	W	G2	B 6-043B	I/S MEDICAL SQ 01
02144670	PREE,DAVID LEE JR	S2	W	OT	TC3-088B	GROUNDSKEEPER T/C SQUAD
01988757	PRINE,ALVIN WESLEY JR	S3	W	G2	C 12-018B	I/S MEDICAL SQ 01
02238344	PROBY,GEORGE EDWARD JR	S2	B	G1	E 20-030B	COUNTER ATTENDANT 1ST
00645636	PROFFITT,GREGORY LYNN	S2	W	OT	TC2-012B	KITCHEN HELPER 1ST T/C
02012732	PUENTE,ANSELEMO JAVIER	S3	H	G2	C 11-004B	UNASGN MEDICAL
02141505	PUENTE,RODOLFO TREVINO	S3	H	G2	C 10-036B	I/S MEDICAL SQ 02
01620472	PUENTE,VICTOR HUGO MORENO	L3	H	G5	AS-AH-03B	TRANS TRANSFER CUST DOWNGRADE
00819734	PULLEN,LESTER TRUMAN	S3	W	G2	C 10-003B	FOLDER LAUNDRY
02170101	RADFORD,JEREMY DEUNTE	S2	B	OT	TC1-041B	FENCE ERECTOR
02157744	RAGSDALE,KEVIN	S2	W	OT	TC3-009B	WASTEWATER TREAT ATTEND
02075242	RAMIREZ,ALFREDO	S3	H	G2	E 19-061B	COUNTER ATTENDANT 3RD
00859019	RAMIREZ,GILBERT	L1	W	G2	E 19-056B	COUNTER ATTENDANT 2ND

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00727127	RAMIREZ,JOEL GANDARIA	S3	H	G2	C 10-017B	FOLDER LAUNDRY
01711776	RAMIREZ,MARIO	S4	H	G2	D 14-027B	UNASGN MEDICAL ISOLATION
02005321	RAMON,HISIDORO DIANDA JR	S2	H	OT	TC3-075B	GROUNDSKEEPER O/S YD SQ 02 A
00707368	RAMON,JOE	S3	H	G2	E 18-031B	KITCHEN HELPER 1ST
00544522	RAMOS,ARMANDO	L1	H	G2	D 14-043B	UNASGN MEDICAL ISOLATION
02065589	RAMOS,HORACIO	S3	H	G2	A 1-003B	I/S MEDICAL SQ 01
02045003	RAMOS,JOSE GUADALUPE	S3	H	G3	A 3-029B	UNASGN MEDICAL
02268513	RANDAL,DENNIS	S2	B	OT	TC1-014B	JANITOR DORM T/C 1-2
02134405	RANDLE,JOE ANTHONY	S3	B	G2	C 09-029B	UNASGN MEDICAL
01888548	READ,DONALD WAYNE	S2	W	OT	TC1-012B	FARM WORKER HOG FEEDER SLAB
01365500	REED,LEONARD JR	S3	B	G2	E 19-025B	UNASGN MEDICAL
00602728	REED,ORAN JR	S2	B	G1	D 14-004B	UNASGN MEDICAL ISOLATION
02277168	REEDER,RICHARD	L1	W	G2	A 3-005B	UNASGN MEDICAL
00636190	REESE,THERAN EUGENE	S3	B	G2	D 15-045B	UNASGN MEDICAL ISOLATION
00739133	REEVES,JACK WAYNE	S3	W	G2	E 19-057B	JANITOR BRASS 1-2
01862822	REEVES,RONALD JUSTIN	S3	W	G2	E 18-017B	KITCHEN HELPER 1ST
02165657	REIS,PERRY DUANE	S3	W	G2	D 15-025B	UNASGN MEDICAL ISOLATION
01866049	REMBERT,KERRY	S2	B	OT	TC2-033B	COOK T/C
02064080	REYES,MARCOS RAMIREZ	S2	H	OT	TC3-102B	GROUNDSKEEPER O/S YD SQ 02 A
02090822	REYES,OCTAVIO	S2	H	OT	TC2-027B	FOLDER LAUNDRY T/C
02067708	REYNA,JOSE ESPARZA	S3	H	G2	B 8-008B	JANITOR DORM 2-1
00456110	REYNOLDS,JAMES ALLEN	S2	W	OT	TC1-044B	FARM WORKER LIVESTOCK
01736893	REYNOLDS,JON JEFFREY	S3	W	G2	E 20-038B	BOILER OPERATOR 1ST
01937442	RHONE,DAVID LAVON	S3	B	G2	E 20-002B	COOK 2ND
01905401	RICHARDS,JOHNNY	S3	B	G2	C 09-047B	I/S MEDICAL SQ 01
00757666	RICHARDSON,BARRY LEON	S2	W	OT	TC3-035B	FOLDER LAUNDRY T/C
01968824	RICHARDSON,DAVID WAYNE	S3	W	G2	D 15-011B	UNASGN MEDICAL ISOLATION
02182038	RICHARDSON,MARKUS DEWANE	L2	B	G2	E 18-037B	KITCHEN HELPER 1ST
02118079	RICKETTS,LARRY ALLEN	S3	W	G2	B 5-036B	I/S MEDICAL SQ 01
02277604	RIDGWAY,SHAWN	S2	W	OT	TC2-056B	KITCHEN HELPER 1ST T/C
01858465	RIDINGS,GAYLAND	S2	W	OT	TC2-052B	KITCHEN HELPER 1ST T/C
02049559	RIGSBAY,ALBERT WESLEY	S3	W	G2	A 1-009B	JANITOR DORM 1-2
02034128	RIGSBY,ALTON LEE	S3	B	G2	A 1-002B	I/S MEDICAL SQ 02
01110002	RILEY,GILBERT ELLIS	S3	W	G2	B 8-025B	FOLDER LAUNDRY 2ND
01919167	RIOS,JOEL RUBIO	S3	H	G2	D 13-049B	UNASGN MEDICAL ISOLATION
02102304	RIOS,MARIO	S3	H	G2	C 12-053B	I/S MEDICAL SQ 02
00716185	RIVERA,ARTURO	S3	H	G2	B 8-047B	GEN CLERK KITCHEN 2ND
02099039	ROBERTS,CODY JD	S2	W	OT	TC3-093B	FARM WORKER GENERAL II
00614296	ROBINSON,JERRY LEE	S3	B	G2	D 14-016B	UNASGN MEDICAL ISOLATION
00394824	ROBINSON,JOHN WESLEY	S3	B	G2	A 1-046B	JANITOR DORM 2-1
01456669	ROBINSON,RONALD	S3	W	G3	A 3-054B	UNASGN MEDICAL
01617046	ROBINSON,WILLIE JR	S3	B	G2	B 7-006B	I/S MEDICAL SQ 01
02157202	RODGERS,COLTEN SHANE	S2	W	OT	TC2-064B	FARM WORKER LIVESTOCK
01758367	RODGERS,KENNETH WAYNE	S3	B	G2	A 4-009B	UNASGN MEDICAL
02210800	RODRIGUEZ,BRANDON	S3	H	G2	E 18-040B	JANITOR DORM 1-1
01828970	RODRIGUEZ,EDMUNDO	S3	H	G2	C 12-050B	FOLDER LAUNDRY
01693800	RODRIGUEZ,EDWARD	S3	H	G2	E 18-048B	BUTCHER 1ST
00804139	RODRIGUEZ,GUADALUPE	S3	H	G2	C 10-023B	I/S MEDICAL SQ 02
01574540	RODRIGUEZ,JUAN	S3	H	G2	E 17-008B	UNASGN MEDICAL
02243632	RODRIGUEZ,MARCO ANTONIO	S2	H	OT	TC3-022B	JANITOR COMMISSARY T/C
01984549	RODRIGUEZ,MARIO	L1	H	OT	TC3-028B	UTILITY REC YARD SQUAD T/C 1-1
00749143	RODRIGUEZ,MATLIDE	S3	H	G2	D 14-002B	UNASGN MEDICAL ISOLATION
01585439	RODRIGUEZ,SALVADOR TORRES	S3	H	G2	B 6-040B	UNASGN MEDICAL

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01705151	RODRIGUEZ,WILBER ADALID	L2	H	G5	AS-PR-10B	TRANS TRANSFER CUST DOWNGRADE
00642271	ROLAND,DONALD DEAN	S3	W	G2	A 3-014B	UNASGN MEDICAL
02231026	ROLDAN,ANGEL	S3	H	G2	D 15-003B	UNASGN MEDICAL ISOLATION
02155330	ROLLINS,DARTANIAN RAY	S2	B	OT	TC1-098B	GEN CLERK AGRICULTURE
00417381	ROMERO,RUDY	S3	H	G2	E 17-020B	JANITOR SHOWER 2ND
01935458	ROQUE,JOSE JAIME MUNOZ	S3	H	G2	B 6-015B	I/S MEDICAL SQ 02
02022169	ROSALES-PANTOJA,ALFREDO	S3	H	G2	C 11-042B	WORK SQUAD 04
01571173	ROSALES,SANTIAGO	S3	H	G2	B 7-054B	JANITOR DORM 2-2
01671402	ROSE,CHRISTOPHER MICHAEL	L1	W	G2	EDUC-007B	UNASGN PENDING ASSIGNMENT
01191993	ROSENBERG,MICHAEL JOSEPH JR	S4	W	G2	C 10-026B	FOLDER LAUNDRY
02274219	ROSS,CLYDE BARRETT JR	S2	B	G1	D 13-018B	UNASGN MEDICAL ISOLATION
00865248	ROSS,LESTER DION	S3	B	G2	E 19-001B	LIBRARY ASSISTANT GEN 2ND
01141767	ROUNSAVALL,COOPER ALAN	S3	W	G2	C 12-041B	I/S MEDICAL SQ 02
02028253	ROUTON,HARLAN WAYNE	S3	W	G3	A 3-052B	JANITOR DORM 2-1
02117361	ROWAN,MICHAEL WAYNE	S2	W	G1	EDUC-012B	UNASGN PENDING ASSIGNMENT
01800317	ROWE,NATHANIEL	S4	B	G3	D 16-002B	UNASGN MEDICAL ISOLATION
01187154	RUBIO,ARMANDO	S3	H	G2	E 19-030B	I/S MEDICAL SQ 02
01835371	RUBIO,BRANDON	S4	H	G2	D 13-012B	UNASGN MEDICAL ISOLATION
02012130	RUIZ,MIKE ALVIN	S3	H	G2	E 20-082B	ICE & WATER DISTRIBUTOR 2-1
01653940	RUSK,MICHAEL JERMAINE	S3	B	G3	D 14-019B	UNASGN MEDICAL ISOLATION
02205969	RYALS,KEVIN WADE	S2	W	OT	TC2-071B	COMMUNITY SERV MAJOR 01 SQ
02132323	RYAN,DAVID WAYNE	S3	W	G2	A 2-023B	UTILITY RECREATION YD SQ 1-1
02126738	SAENZ,JOSE	S2	H	OT	TC2-077B	TRACTOR OPERATOR
01373168	SAIN,JOHN RAY	S3	W	G2	E 19-009B	UNASGN MEDICAL
01985122	SALAZAR,ANDREW	S2	H	OT	TC3-031B	JANITOR FRONT OFFICE 1ST
01999725	SALAZAR,CHRISTOPHER	S3	H	P7	AP-26B	PROTECT SAFEKEEPING PSK7
01732844	SALINAS,ISMAEL REYNA	S3	H	G2	C 12-020B	I/S MEDICAL SQ 01
01361053	SALINAS,VICTOR	S3	H	G2	B 5-050B	UNASGN MEDICAL
02088531	SAMUEL,CEDRICK LAMONT	S3	B	G2	D 14-026B	UNASGN MEDICAL ISOLATION
01736160	SANCHEZ HERNANDEZ,SAUL	S3	H	G3	E 19-062B	JANITOR DORM 2-1
01977308	SANCHEZ,ABEL FLORES	S3	H	G2	C 10-053B	I/S MEDICAL SQ 02
01844070	SANCHEZ,BENJAMIN ANTHONY	S2	H	OT	TC1-005B	COOK T/C
01657484	SANCHEZ,RAYMOND	S3	H	G2	D 14-029B	UNASGN MEDICAL ISOLATION
01231898	SANCHEZ,TRINO GUERRA SR	S3	H	G2	B 8-030B	I/S MEDICAL SQ 01
02030548	SANDERS,MARCUS DONELL	S2	B	OT	TC1-073B	JANITOR DORM T/C 1-1
01799180	SANDERS,MARSHUN JAMES	S2	B	OT	TC3-039B	COMMUNITY SERV MAJOR 01 SQ
00938442	SANDLES,CLAUDE DANIEL SR	S3	B	G2	B 5-035B	UNASGN MEDICAL
01927371	SANDOVAL,LOUIE ANGEL	S3	H	G2	E 18-022B	JANITOR DORM 2-1
00551355	SANDOVAL,PATRICK CHARLES	S3	H	P7	AP-19B	PROTECT SAFEKEEPING PSK7
00322716	SANSOM,ROY WILLIAM	L1	W	G2	A 4-010B	UNASGN MEDICAL
00842207	SANTANA,ALEJOS	L1	H	P7	AP-28B	PROTECT SAFEKEEPING PSK7
01933629	SANTOS-GARCIA,CESAR	S3	H	G2	D 15-016B	UNASGN MEDICAL ISOLATION
01036569	SARGENT,BUSTER	S3	W	G2	C 09-009B	UNASGN MEDICAL
01245372	SAUCEDA,JOSE	S3	H	G2	B 7-049B	FOLDER LAUNDRY 2ND
02119889	SAVAGE,RICHARD AUGUST	S3	W	G2	B 7-017B	I/S MEDICAL SQ 02
01366096	SAVILLE,JIMMY	S2	W	G1	E 20-010B	FOLDER LAUNDRY
01182529	SCHREYER,ULRICH EDWARD	L3	W	G2	B 5-014B	UNASGN MEDICAL
01874383	SCHULE,BOBBY CARL	S3	W	G2	E 18-005B	CLOTHING EXCHANGER 1ST
00521243	SCHUMACHER,THOMAS	S3	W	G2	EDUC-013B	UNASGN PENDING ASSIGNMENT
02126173	SCROGGINS,STEPHEN WAYNE	S2	W	OT	TC1-101B	FOLDER LAUNDRY T/C
01982719	SEAGROVES,DOYLE	S3	W	G3	A 3-008B	I/S MEDICAL SQ 02
01437215	SELF,WILLIAM EUGENE JR	S3	W	G2	C 09-006B	UNASGN MEDICAL
01393750	SESMA,RICHARD	S3	W	G2	E 20-060B	KITCHEN HELPER 3RD

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00820789	SHARP, CHRISTOPHER WARREN	S3	W	P7	AP-18B	PROTECT SAFEKEEPING PSK7
01449690	SHAW, ROGER	S2	W	G1	E 20-006B	JANITOR SHOWER 1ST
02245304	SHEELER, SAMUEL LEE	S2	W	OT	TC2-045B	GEN CLERK AGRICULTURE BR
01856021	SHEFFIELD, ERNEST	S3	B	G2	C 10-004B	I/S MEDICAL SQ 01
02092188	SHELTON, ROBERT DUANE	S2	W	OT	TC3-051B	COMMUNITY SERV MAJOR 01 SQ
02074091	SHEPHERD, DAVE	L1	B	G2	C 10-050B	COUNTER ATTENDANT 1ST
02109405	SHIELDS, JOHN	S2	W	OT	TC3-034B	GROUNDSKEEPER T/C SQUAD
02278476	SHIELDS, STEVEN DALE	S3	W	G2	C 12-049B	CLOTHING EXCHANGER 1ST
01773679	SHIRLEY, JIMMY PAUL	S2	W	OT	TC1-009B	KITCHEN HELPER 1ST T/C
00626479	SHIRLEY, RONALD KEITH	S3	W	G2	E 19-002B	UNASGN MEDICAL
00711866	SHOEFSTALL, TOMMY RUSS	S3	W	G2	A 4-029B	UNASGN MEDICAL
02061823	SHORTER, HOLLIS JAMES JR	S3	B	G2	EDUC-016B	UNASGN PENDING ASSIGNMENT
02243848	SHRUM, RICHARD	S2	W	OT	TC2-094B	KITCHEN HELPER 1ST T/C
01366652	SIDLE, JOHN ARTHUR	S2	W	OT	TC3-104B	FOLDER LAUNDRY T/C
01934398	SILVERIO, JAIME FELIPE	S3	H	G2	E 19-003B	JANITOR DORM 2-2
02206615	SIMMONS, BILLY DWAYNE	S3	W	G2	C 09-004B	COUNTER ATTENDANT 1ST
01940224	SIMMONS, CHRISTOPHER JOHN	S2	W	OT	TC1-056B	FOLDER LAUNDRY T/C
01702384	SIMMONS, RHONNIE ODELL	S3	B	G2	C 10-032B	JANITOR DORM 1-2
00899703	SIMPSON, HENRY RAY	S3	B	G2	B 6-044B	UNASGN MEDICAL
02238052	SIMPSON, JACKIE LYNN	S2	W	OT	TC3-011B	UNASGN MEDICAL
02038635	SIMPSON, JAMES ANDREW	L3	B	G2	E 19-021B	COUNTER ATTENDANT 2ND
00779036	SKATES, DALE EDWARD	S3	W	G2	B 7-008B	FOLDER LAUNDRY
01564235	SMILEY, STEVE FONTAINE	S3	W	G2	C 12-035B	JANITOR DORM 1-1
01703605	SMITH, AARON WADE	S4	W	G3	E 19-067B	WORK SQUAD 03
00305769	SMITH, CHARLES EDWARD	S3	B	G2	A 1-049B	UNASGN MEDICAL
02081792	SMITH, CHARLESTON EDWARD	S3	B	G2	B 7-045B	UNASGN MEDICAL
01998949	SMITH, CHRISTOPHER SCOTT	S2	W	OT	TC3-079B	WATER TREAT PLANT OPER PUMP
01492593	SMITH, DAVID ALLEN	S3	W	G2	D 13-034B	UNASGN MEDICAL ISOLATION
01553876	SMITH, DENNIS	S3	W	G2	B 6-033B	I/S MEDICAL SQ 01
02186631	SMITH, DUDLEY GENE JR	S2	W	G1	E 20-003B	JANITOR MEDICAL
00653467	SMITH, EARL CLARENCE	S2	B	OT	TC2-063B	FOLDER LAUNDRY T/C
02295351	SMITH, GARY LYNN	L1	W	OT	TC2-061B	JANITOR DORM T/C 1-1
02180613	SMITH, GARY MICHAEL	S3	W	G3	A 3-042B	UNASGN MEDICAL
02085009	SMITH, JAMES DARYL	S2	W	OT	TC1-099B	KITCHEN HELPER 1ST T/C
02045747	SMITH, JERRY LYNN	S2	W	OT	TC3-096B	KITCHEN HELPER 1ST T/C
01777037	SMITH, JIMMY CARLTON	S4	W	G2	E 19-005B	I/S MEDICAL SQ 01
02263660	SMITH, MICHAEL LEE	S3	W	G2	A 4-013B	UNASGN MEDICAL
00687540	SMITH, MICHAEL RAY	S3	B	G2	E 20-036B	FIELD MINISTER
02197592	SMITH, RAYMOND SAMMY	S3	W	G2	B 5-003B	UNASGN MEDICAL
02264184	SMITH, ROBERT	S3	W	G2	C 09-040B	UNASGN MEDICAL
00581044	SMITH, ROBERT CHARLES	S2	B	OT	TC2-100B	KITCHEN HELPER 1ST T/C
01585206	SNODGRASS, VIRGIL	S2	W	OT	TC3-044B	JANITOR DORM T/C 2-2
02221353	SOBREVILLA, JAVIER JR	L3	H	G2	C 09-027B	FOLDER LAUNDRY
02000415	SOILEAU, TRAVIS BLAINE	L1	W	G2	C 10-009B	UNASGN MEDICAL
01260316	SPARROW, JAMES RAY	S3	W	G2	A 3-004B	UNASGN MEDICAL
01867950	SPENCER, JIMMY EARL	S3	B	G2	A 2-012B	UNASGN MEDICAL
01782762	SPRATT, MICAH LEWIS	S2	B	OT	TC3-059B	KITCHEN HELPER 1ST T/C
02247776	SQUALLS, SOLOMON BURKE	S2	B	OT	TC2-034B	JANITOR CLEANING SQUAD TC
02035141	SRADER, CODY ALLAN	S3	W	G3	A 4-017B	UNASGN MEDICAL
02079767	STEEL, DAVID LEE	S2	W	OT	TC1-030B	FARM WORKER LIVESTOCK
02189723	STEELS, ANTHONY DEWAYNE	S2	B	OT	TC3-105B	JANITOR DORM T/C 2-1
02009378	STEELS, CHRISTOPHER	S2	B	G1	E 20-050B	CLOTHING ATTENDANT OFFICER
02026968	STERLING, MICHAEL EARL	S3	B	G2	E 20-075B	JANITOR DORM 2-2

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
00517043	STERLING,WILLIAM EDWARD	S3	W	G2	B 5-018B	UNASGN MEDICAL
02203331	STERNKOPF,DAVID	S3	W	G2	C 12-046B	UNASGN MEDICAL
01897620	STEWART,CHARLIE LEE SR	S3	B	G3	D 14-050B	UNASGN MEDICAL ISOLATION
01426347	STEWART,RODERICK	S3	B	G2	A 4-030B	JANITOR DORM 1-1
02161930	STIRLE,TIMOTHY WAYNE	S3	W	G2	B 5-012B	UNASGN MEDICAL
02016630	STRASKULIC,EUGENE ROBERT	S2	W	OT	TC2-022B	TRACTOR OPERATOR BR
02004595	STRAUBING,KYLE CHRISTIAN	S3	W	G2	D 13-048B	UNASGN MEDICAL ISOLATION
00413816	STRIBLING,ANTHONY C	S3	B	G2	B 8-024B	UNASGN MEDICAL
02299305	STRICKLAND,JAMES RAY	L1	W	G2	E 19-050B	FOLDER LAUNDRY
00403672	STUBBLEFIELD,FRANK EUGENE	S3	B	G2	D 15-042B	UNASGN MEDICAL ISOLATION
01705243	SWARN,HOMER C	S3	B	G3	EDUC-002B	UNASGN PENDING ASSIGNMENT
00791670	SWARTHOUT,JAMES DANIEL	S3	W	G2	E 20-092B	BAKER 1ST
02271816	SWINNEY,BRIAN JAMES	S3	W	G3	A 4-008B	UNASGN MEDICAL
01908208	SWOFFORD,CHRISTOPHER DAVID	S3	W	G2	D 13-025B	UNASGN MEDICAL ISOLATION
02010880	TAFT,PATRICK ARTHUR	S3	W	G2	B 8-045B	UNASGN MEDICAL
02093554	TAGLE,ROBERTO	S3	H	G2	B 6-027B	UNASGN MEDICAL
01723194	TAIYM,ZIYAD	S3	O	G2	E 17-009B	COUNTER ATTENDANT 1ST
02239062	TALBERT,CARL	S3	B	G2	C 11-053B	UNASGN MEDICAL
01703594	TALLEY,RAY GENE	S3	W	G2	A 1-034B	UNASGN MEDICAL
02021431	TAMAYO,ERNEST	S2	H	OT	TC2-054B	JANITOR BOQ
02026970	TANKERSLEY,AUDY KEVIN	S3	W	G2	C 12-006B	I/S MEDICAL SQ 01
01237238	TAO,KHOA DANG	S3	O	G2	D 14-017B	UNASGN MEDICAL ISOLATION
02102492	TAYLOR,JOHN CLAYBOYD	S2	W	OT	TC2-057B	KITCHEN HELPER 1ST T/C
00320982	TAYLOR,LYNN	S3	B	G2	B 5-011B	UNASGN MEDICAL
01683550	TAYLOR,MICHAEL STEPHAN	S3	W	G2	E 20-072B	JANITOR CLEAN ISSUE 1ST
01957305	TAYLOR,TONY	S3	B	G2	E 20-093B	JANITOR SECURITY
01306307	TEAGUE,JOHN HENRY III	S3	W	G2	A 3-027B	UNASGN MEDICAL
01215845	TEALER,CHRISTOPHER	S3	B	G2	E 20-053B	JANITOR SEG 1ST
00775725	TEMPLETON,LYNZIE D.	S3	B	G2	E 19-060B	I/S MEDICAL SQ 02
02036325	TEMPLIN,RONNIE LEE	S2	W	OT	TC2-090B	JANITOR DORM T/C 2-2
00619043	TENNISON,KEITH ARTHUR	S3	B	G2	B 6-034B	UNASGN MEDICAL
01559726	TERRELL,HOWARD LEE	S2	B	G1	E 20-021B	COUNTER ATTENDANT 2ND
02113678	TERRELL,TERRY LEE	S3	W	G2	B 7-012B	UNASGN MEDICAL
01999898	THACKER,ROBBIE	S4	B	G2	B 8-017B	UTILITY SQ CAPTAIN
01555250	THOMAS,ALBERT VINCENT	S3	B	G2	C 11-021B	COUNTER ATTENDANT 3RD
00498761	THOMAS,EDDIE	S2	B	G1	E 20-001B	CLOTHING EXCHANGER 2ND
02125228	THOMAS,KEITH	S3	B	G2	E 17-042B	UNASGN MEDICAL
00305829	THOMAS,TOMMY VIRGIL	L1	B	G2	EDUC-008B	UNASGN PENDING ASSIGNMENT
02063947	THOMAS,TONY REED	S3	W	G2	C 09-037B	UNASGN MEDICAL
02066569	THOMPSON,ELTON PERRY	S3	B	G2	B 8-036B	FOLDER LAUNDRY 2ND
01454238	THOMPSON,RICHARD DUWAYNE	S3	W	G2	C 09-002B	UNASGN MEDICAL
01964983	TIMLER,JOHN SCOTT	S3	W	G2	A 2-006B	JANITOR DORM 1-1
01851697	TOBIAS,ELIAS CANTU	S3	H	G2	B 7-015B	UNASGN MEDICAL
00277927	TODD,JIMMY WEBB	S3	W	G2	B 7-032B	UNASGN MEDICAL
02170240	TOMERLIN,HOMER C III	S3	W	G2	C 12-022B	UNASGN MEDICAL
01735390	TORRES,SANTIAGO TORRES	S3	H	G2	E 20-040B	JANITOR COMMISSARY 1ST
00577586	TOUCHSTONE,JOE LEE	L2	W	G2	D 14-014B	UNASGN MEDICAL ISOLATION
02215092	TOWLES,JUSTIN LEE	S2	W	OT	TC3-086B	CARPENTER MAINTENANCE
01457084	TOWNSEND,JIMMIE LEE	S3	W	P7	AP-22B	PROTECT SAFEKEEPING PSK7
02016239	TRAMMELL,JERAL WAYNE	S2	W	OT	TC2-041B	TRACTOR OPERATOR BR
01557515	TRETTER,WAYNE CHARLES	S4	W	G2	A 1-007B	UNASGN MEDICAL
01863245	TREVINO,MIKE	S3	H	G2	B 7-039B	I/S MEDICAL SQ 02
01649283	TREVINO,RAUL	S3	H	G2	D 14-046B	UNASGN MEDICAL ISOLATION

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01929189	TREVINO,TRACY	S3	H	G2	B 7-052B	JANITOR DORM 2-1
00338043	TRIBBLE,WENDELL MARION	S3	W	G2	C 11-010B	COUNTER ATTENDANT 2ND
01888239	TROLLINGER,BRUCE EDWARD	S2	W	OT	TC1-092B	FOLDER LAUNDRY T/C
02104966	TUCKER,SAMUEL ALAN	S3	W	G2	E 19-051B	FOLDER LAUNDRY 2ND
02043375	TUCKER,VICTOR RAMON	S3	B	G2	C 12-013B	COUNTER ATTENDANT 2ND
02198838	TULL,RICKY GEORGE	S2	W	OT	TC3-049B	FOLDER LAUNDRY T/C
01072590	TURNER,GERALD TYRONE	S3	W	G3	A 3-053B	UNASGN MEDICAL
02053949	TURNER,JOHN DURANN	S2	B	OT	TC3-002B	JANITOR SURPLUS WRHSE
01241225	TURNER,JULIUS	S4	B	G2	EDUC-006B	UNASGN PENDING ASSIGNMENT
00872723	TUTOR,BILL MARCUS	S3	W	G2	A 1-011B	UNASGN MEDICAL
01309701	TYLER,GEORGE ELWYN	S3	W	G2	E 19-022B	UNASGN MEDICAL
01320517	TYLER,RALPH	S3	B	G2	C 12-042B	UNASGN MEDICAL
01830486	TYRRELL,ROBERT JAMES	L1	W	G2	D 15-024B	UNASGN MEDICAL ISOLATION
02199242	UMATUM,BLAKE	S2	W	OT	TC1-024B	KITCHEN HELPER 1ST T/C
02017364	VALDEZ,REYNALDO	S3	H	G2	B 7-010B	UNASGN MEDICAL
01939583	VALENTI,JOSHUA FRANK	S3	B	G2	E 20-052B	JANITOR SECURITY
01782033	VALENTINE,LADDY CURTIS	S3	W	G3	D 14-006B	UNASGN MEDICAL ISOLATION
01997966	VALERO,ANDREW MOSES	S3	H	G2	A 4-001B	UNASGN MEDICAL
01924413	VALVERDE,BENITO CAVAZOS	S3	H	G2	A 1-006B	UNASGN MEDICAL
01660512	VARELA,ANDREW	S3	H	G2	E 20-054B	PRESSER LAUNDRY
01908401	VASQUEZ,ALBERT JR	S3	H	G2	E 19-036B	I/S MEDICAL SQ 02
00687218	VASQUEZ,JERRY LEE	S3	W	G2	D 13-007B	UNASGN MEDICAL ISOLATION
01913737	VAUGHAN,MICHAEL EUGENE	S3	W	G2	B 5-049B	JANITOR DORM 1-2
01874909	VAUGHN,JON	S3	W	G2	B 5-010B	I/S MEDICAL SQ 01
02109494	VAUGHN,KENNETH RAY	S2	W	OT	TC1-064B	TRACTOR OPERATOR
00800939	VAUGHN,ROBERT WAYNE	S3	W	G2	B 5-016B	UNASGN MEDICAL
02106083	VEGA,JOSE MENESES	S3	H	G2	D 14-008B	UNASGN MEDICAL ISOLATION
02093732	VELA,ALEJANDRO	S3	W	G3	D 15-017B	UNASGN MEDICAL ISOLATION
02261408	VELIZ,RICHARD RENTERIA	S2	H	OT	TC1-039B	FOLDER LAUNDRY T/C
02026708	VERA,LUIS	S2	H	OT	TC1-049B	JANITOR DORM T/C 2-2
01023610	VERY,FREDRICK EDWARD	S3	W	G3	A 4-026B	UNASGN MEDICAL
02022742	VESSELL,LEON	S3	W	G2	B 8-012B	I/S MEDICAL SQ 01
00899756	VILLA,DONALD RAY	S3	H	P7	AP-17B	PROTECT SAFEKEEPING PSK7
01786885	VILLARES,ADRIAN SANCHEZ	S3	H	G2	B 8-004B	COUNTER ATTENDANT 3RD
02169360	VILLARREAL,ALEXANDER R	S3	H	G2	D 13-028B	UNASGN MEDICAL ISOLATION
01364926	VILLARREAL,JOEL FRANCISCO	S4	H	G2	EDU-002B	UNASGN PENDING ASSIGNMENT
01911445	VILLARREAL,RAUL	S2	H	G1	D 15-028B	UNASGN MEDICAL ISOLATION
01376239	VINSON,DOUGLAS KEITH	S4	W	G2	B 6-008B	COUNTER ATTENDANT 2ND
01362329	VODOCHODSKY,KENNETH	S3	H	G2	E 20-043B	ARTIST UNIT
00648721	VOGT,MELVIN JOSEPH	L3	W	G2	A 1-052B	I/S MEDICAL SQ 01
02092463	VOSS,AUSTIN WAYNE	S2	W	G1	E 19-075B	WASTEWATER TREAT ATTEND
02164334	VU,NGOC	S3	A	G2	A 3-043B	UNASGN MEDICAL
01614918	WADE,JODIE	S3	W	G2	A 2-008B	UNASGN MEDICAL
00316039	WAGNER,RANDALL PAUL	S3	W	G2	D 14-024B	UNASGN MEDICAL ISOLATION
01987206	WALDO,JASON ANTHONY	S2	W	OT	TC3-080B	WASTEWATER TREAT ATTEND
00784775	WALKER,BILLY MACK JR	S2	W	G1	E 20-022B	UNASGN MEDICAL
01872359	WALKER,MICHAEL MARSENE	S2	B	OT	TC1-090B	FOLDER LAUNDRY T/C
01458446	WALKER,PAUL BRYANT	S3	W	G2	E 20-035B	COOK 2ND
01588096	WALKER,STEVEN LEE	S2	W	OT	TC3-060B	HEAT AND AC REPAIR
01891050	WALKER,WILBERT	S3	B	G2	A 3-037B	UNASGN MEDICAL
01905734	WALL,JOHN ANTHONY	S3	W	G2	D 16-001B	UNASGN MEDICAL ISOLATION
01980250	WALLER,TREYVON ROBERT	S2	B	OT	TC1-028B	GROUNDSKEEPER O/S YD SQ 02 A
01444725	WALSTON,FRANKLIN DUANE	S4	W	G2	A 3-013B	UNASGN MEDICAL

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01976026	WALTERS,BOBBY LYNN SR	S3	W	G2	E 19-004B	SAFETY TECH FIREWATCH KIT 2ND
01430003	WALTON,TERRANCE	S3	B	G2	E 20-080B	PRESSER LAUNDRY
01561325	WAMSLEY,JASON SCOTT	S3	W	G2	E 20-057B	LANDSCAPE GARD INSIDE YD SQ 01
02002136	WARD,BRENT SHERMAN	S2	W	OT	TC2-047B	TOOL CRIB ATTEND FARM
01504475	WARD,ROY LAVERN	S3	W	G2	C 11-024B	KITCHEN (TEMP) 72 HR
02169229	WARR,JAMES	S2	W	OT	TC2-062B	FOLDER LAUNDRY T/C
01818049	WARREN,ROBERT EARL JR	S3	B	G2	C 10-029B	I/S MEDICAL SQ 02
01023643	WASHINGTON,FREDERICK EARL	S4	B	G2	B 6-023B	UNASGN MEDICAL
00455356	WASHINGTON,KENNETH RAY	L1	B	G2	B 6-002B	UNASGN MEDICAL
02278994	WASHINGTON,THORNTON JAMES	S2	B	OT	TC2-010B	GROUNDSKEEPER O/S YD SQ 02 A
01645698	WATKINS,KERRY WAYNE	S2	W	OT	TC3-055B	JANITOR CLEANING SQUAD TC
02003013	WATKINS,MICHAEL SHAN	S2	W	OT	TC1-050B	FARM EQUIPMENT MECHANIC I
02012144	WATTS,MICHAEL	S3	W	G3	D 15-018B	UNASGN MEDICAL ISOLATION
00887418	WEAVER,JOHN L.	S3	B	G2	A 2-016B	JANITOR DORM 2-2
02206269	WEIMER,BARNEY LEE	S2	W	OT	TC2-058B	KITCHEN HELPER 1ST T/C
02062590	WELLS,GERALD WAYNE	S3	W	G2	D 13-032B	UNASGN MEDICAL ISOLATION
02255530	WERNER,CARL EVAN	S2	W	OT	TC1-025B	FARM WORKER LIVESTOCK
01610532	WERNER,VINCENT DAVID	S3	W	G2	E 20-007B	BOILER OPERATOR 1ST
01576196	WESLEY,CLARENCE LAMOUNT	S3	B	G2	E 20-019B	JANITOR SEG 2ND
02200957	WEST,STANLEY WAYNE SR	S3	W	G2	D 15-014B	UNASGN MEDICAL ISOLATION
00434242	WESTBROOKS,HUBERT LAWRENCE	S2	B	OT	TC1-106B	GEN CLERK MAINTENANCE
02064180	WHEATLEY,JOSHUA DANIEL	S3	W	G2	C 12-008B	JANITOR DORM 2-1
01841394	WHITAKER,DONNIE RAY	S2	W	OT	TC3-089B	UNASGN MEDICAL
01873439	WHITBY,JASON LEE	S3	B	G2	EDUC-015B	UNASGN PENDING ASSIGNMENT
02261769	WHITE,EUGENE	S2	B	OT	TC1-045B	MAINTENANCE MECHANIC OUTSIDE
02107448	WHITE,ZACHARY	S2	W	OT	TC1-002B	FARM WORKER LIVESTOCK
02141014	WHITFIELD,ANTHONY	S2	B	OT	TC3-072B	UTILITY REC YARD SQUAD T/C 1-2
01990847	WHITFIELD,CURTIS	S3	B	G2	A 3-032B	I/S MEDICAL SQ 02
01593425	WHITLEY,JAMES GLENN	S3	W	G2	A 3-019B	UNASGN MEDICAL
00808909	WHITMIRE,JOHN WILSON	S3	W	G2	B 5-007B	UNASGN MEDICAL
01512772	WHITNEY,GARY ALLEN SR	S3	W	G2	B 5-041B	I/S MEDICAL SQ 02
01809917	WHITT,EDGAR DALE	S3	W	G2	C 10-016B	UNASGN MEDICAL
01550163	WICKER,MARK LYNNZIE	S2	B	OT	TC2-042B	FOLDER LAUNDRY T/C
01658776	WIGGINS,STEVEN ALLEN	S2	W	OT	TC1-001B	GEN CLERK AGRICULTURE
00820572	WILKERSON,NORMAN R	S3	W	G2	EDUC-010B	UNASGN PENDING ASSIGNMENT
02297032	WILKINSON,GARY JIM	L1	W	OT	TC1-000B	FOLDER LAUNDRY T/C
01535714	WILLCOXSON,ERVIN DUANE	S3	W	G2	B 8-002B	JANITOR DORM 1-1
00510649	WILLIAMS,CHARLES EDWARD	S3	B	G2	E 19-010B	I/S MEDICAL SQ 01
01565086	WILLIAMS,DAVID KENDALL	S3	W	G2	B 8-005B	UNASGN MEDICAL
01991730	WILLIAMS,DAVID L	S2	W	OT	TC2-026B	TRUCK DRIVER HEAVY BR
02100253	WILLIAMS,EDWIN	S3	B	G2	E 19-031B	FOLDER LAUNDRY
01530903	WILLIAMS,JERRY WAYNE	S3	W	G2	D 15-031B	UNASGN MEDICAL ISOLATION
02116566	WILLIAMS,JOHNNIE JACOBY	S2	B	OT	TC2-059B	GEN CLERK MAINTENANCE
02036134	WILLIAMS,MATTHEW TALBOT JR	S2	W	OT	TC2-038B	MAINTENANCE MECHANIC OUTSIDE
01653483	WILLIAMS,RANDY LEE	S3	W	G2	C 10-012B	UNASGN MEDICAL
01812454	WILLIAMSON,ROBERT LEE	S3	W	G2	E 17-037B	UNASGN MEDICAL
01848584	WILLIS,JOEL DERVIN	S3	W	G2	B 5-038B	UNASGN MEDICAL
02142719	WILLS,WILLIAM TOMAS	S2	W	OT	TC2-079B	GROUNDSKEEPER O/S YD SQ 02 A
01831525	WILSON,ALAN DALE	S3	W	G2	D 14-035B	UNASGN MEDICAL ISOLATION
02160109	WILSON,BYRON LEMUEL	S3	B	G2	B 7-037B	JANITOR DORM 1-2
02199955	WILSON,DANNY OREN	S3	W	G3	A 3-022B	UNASGN MEDICAL
01648044	WILSON,DAVID LEE	S3	W	G2	E 20-025B	MATERIAL HANDLER KITCHEN 2ND
00851208	WILSON,DEMOND LAMONT	S4	B	G2	EDUC-021B	UNASGN PENDING ASSIGNMENT

TDC#	NAME	ST	R	CU	HOUSE	JOB DESCRIPTION
01250614	WILSON,DUANE CORTEZ	S3	B	G2	C 12-027B	I/S MEDICAL SQ 01
02005434	WILSON,JAMES BYRON	S3	W	G2	C 12-048B	KITCHEN HELPER 1ST
01601013	WILSON,JULIUS JR	S3	B	G2	D 13-023B	UNASGN MEDICAL ISOLATION
02041108	WILSON,KEVIN WADE	L2	W	G2	E 19-053B	COUNTER ATTENDANT 1ST
00672902	WILSON,LENORRIS	S2	B	OT	TC1-059B	FOLDER LAUNDRY T/C
01896527	WILSON,ROBERT A	S3	H	G2	C 11-054B	BUTCHER 1ST
01885533	WINDHAM,CHRIS DEAN	S3	W	G2	A 1-053B	I/S MEDICAL SQ 01
01555464	WINGO,SHAWN	S3	W	G2	C 10-019B	JANITOR DORM 2-2
00490554	WINKFIELD,JEFFERSON DAVIS	L3	B	G2	AS-AH-04B	UNASGN PENDING ASSIGNMENT
00719157	WINSTON,DAVID LEONARD JR	S3	B	G2	C 10-040B	UNASGN MEDICAL
01859849	WOLF,CLAIR A	S3	W	G3	A 3-016B	I/S MEDICAL SQ 01
02153034	WOLF,DOUGLASS JUDD	S2	W	OT	TC1-095B	STABLE ATTENDANT
00554581	WOOTEN,THEOPHILUS	S2	B	G1	E 20-029B	I/S MEDICAL SQ 02
01654203	WRAY,FRANKLIN	S3	W	G2	A 1-032B	UNASGN MEDICAL
01218734	WRIGHT,JASON	S3	W	G2	E 19-085B	UNASGN MEDICAL
01972593	WRIGHT,MICHAEL WYNN	S3	W	G2	D 15-038B	UNASGN MEDICAL ISOLATION
01581418	YATES,MARVIN RAY	S3	W	G2	A 3-009B	I/S MEDICAL SQ 02
02072922	YBARRA,SAMMY	S3	H	G2	E 19-037B	UNASGN MEDICAL
01273716	YOUNG,ERROL	L1	B	G2	A 4-006B	UNASGN MEDICAL
01802367	YOUNG,JIMMY	S2	B	OT	TC1-102B	FOLDER LAUNDRY T/C
01123712	YOUNG,JIMMY WAYNE	S3	W	G2	D 14-010B	UNASGN MEDICAL ISOLATION
00640158	YOUNG,JOHNNY ENRIQUE	S3	B	G2	A 4-025B	UNASGN MEDICAL
02033536	YOUNG,THOMAS ODELL JR	S3	W	G2	B 5-019B	I/S MEDICAL SQ 02
00607017	ZAHN,WILLIAM E	S2	W	OT	TC3-030B	FOLDER LAUNDRY T/C
01292211	ZAMORA,GABRIEL AMADOR	S3	H	G2	E 18-047B	KITCHEN HELPER 1ST
01770051	ZAPATA,FELIX	S2	H	OT	TC3-038B	FOLDER LAUNDRY T/C
01605580	ZEIGLER,ROYCE CLYDE II	S3	W	P7	AP-24B	PROTECT SAFEKEEPING PSK7
01934919	ZIKO,DANNY	S2	W	OT	TC3-068B	MAINTENANCE MECHANIC OUTSIDE
01743225	ZINNIEL,DAVID RAYMOND	S3	W	G2	E 20-077B	BOILER OPERATOR 2ND
01868872	ZULIANI,GERALD CHRISTOPHER	L3	W	G2	A 1-020B	UNASGN MEDICAL

TOTAL: 1,196

Exhibit P

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated, Plaintiffs,	*	
v.	*	CIVIL ACTION NO. 4:20-cv-01115
BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, And TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	*	

VIDEOCONFERENCED DEPOSITION

OF

MICHAEL SMITH, TDCJ #2263660

July 7, 2020

VIDEOCONFERENCED DEPOSITION OF MICHAEL SMITH, TDCJ # 2263660, produced as a witness at the instance of the Defendants, and duly sworn, was taken in the above-styled and numbered cause on Tuesday, July 7, 2020, from 11:33 a.m. to 2:00 p.m., before Debbie D. Cunningham, CSR, in and for the State of Texas, remotely reported via Machine Shorthand, pursuant to the Federal Rules of Civil Procedure.

--ooOoo--

injuries that you had?

A. I broke my femur on my right leg in that accident, and I had an ulcer that burst.

Q. So how did that accident affect your health afterwards? Do you have any sort of long-term effects from that?

A. Yeah. I mean, I have, like, paralysis of, like, my internal organs. Like, some of the organs don't function properly. Like, my lungs, I have half capacity. And then my bladder and all, I don't have control of it because it's paralyzed; and I've had to be, like, on a bowel program.

Q. I'm sorry. What was that last thing, you have to be on a what?

A. A bowel program to use the restroom, yeah.

Q. So are you ambulatory, or do you require a wheelchair?

A. I require a wheelchair at all times. I'm paralyzed from midchest, down.

Q. And I'm assuming all those issues that you mentioned, your lung capacity and bladder issues, all of those were a direct result of the spinal cord separation?

A. Correct, ma'am.

Q. Have you been diagnosed with anything else

STATE OF TEXAS)

REPORTER'S CERTIFICATION

I, DEBBIE D. CUNNINGHAM, CSR, hereby certify that the witness was duly sworn and that this transcript is a true record of the testimony given by the witness.

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Subscribed and sworn to by me this day, July 8, 2020.

Debbie D. Cunningham, CSR
Texas CSR 2065
Expiration: 6/30/2021
INTEGRITY LEGAL SUPPORT SOLUTIONS
P.O. Box 245
Manchaca, Texas 78652
www.integrity-texas.com
512-320-8690; FIRM # 528

Exhibit Q

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated, Plaintiffs,	*	
v.	*	CIVIL ACTION NO. 4:20-cv-01115
BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, And TEXAS DEPARTMENT OF CRIMINAL JUSTICE, Defendants.	*	

VIDEOCONFERENCED DEPOSITION

OF

HAROLD DOVE, TDCJ #255592

July 6, 2020

VIDEOCONFERENCED DEPOSITION OF HAROLD DOVE, TDCJ #255592, produced as a witness at the instance of the Defendants, and duly sworn, was taken in the above-styled and numbered cause on Monday, July 6, 2020, from 11:33 a.m. to 1:30 p.m., before Debbie D. Cunningham, CSR, in and for the State of Texas, remotely reported via Machine Shorthand, pursuant to the Federal Rules of Civil Procedure.

--ooOoo--

deposition?

A. Excuse me. My speech is not very good --

Q. Yes, sir.

A. -- because I had a stroke November of last year.

Q. Okay.

A. And the paralysis is -- has affected me where I cannot answer your questions properly.

Q. Yes, sir.

A. But I'll do the best I can.

Q. I appreciate that, sir.

And let me ask you this: On account of that stroke, is that going to prevent you from giving full and honest testimony here?

A. No.

Q. Okay. Is there anything else that would prevent you from giving full and honest testimony here?

A. Well, other than the fact that I'm 80 percent blind.

Q. Okay. I don't anticipate putting anything up on the screen that will require you to read. It will only be listening to my questions and us having a conversation. Is that okay with you?

A. Okay.

Q. And so you mentioned that you had a stroke

back in November and that you're 80 percent blind. What other current medical conditions do you have?

A. I have paralysis in my thumbs and my feet. I'm in a wheelchair.

Q. Okay. Is that complete paralysis?

A. Well, so far. They haven't told me anything different.

Q. Different than it's complete paralysis?

A. Yes.

Q. Okay. Did you review any documents to get ready for today's deposition?

A. I cannot read. I can't see. So I...

Q. Okay. Did you discuss any documents to get ready for today's deposition?

A. Somewhat.

MR. MURPHY: Hold on one second. I would just instruct Mr. Dove just not to disclose the subject or anything you talked about specifically with Counsel. They're not entitled to know that because that's privileged. You can answer the question generally, but just don't get into anything we talked about specifically. Okay?

THE WITNESS: Okay.

MR. MURPHY: Okay.

Q (BY MR. BRAMOW) Yes, sir. And just to kind

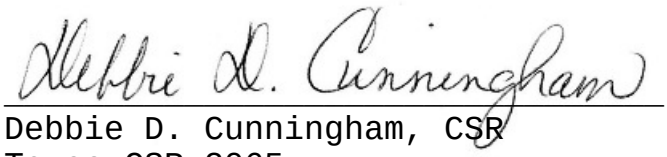
STATE OF TEXAS)

REPORTER'S CERTIFICATION

I, DEBBIE D. CUNNINGHAM, CSR, hereby certify that the witness was duly sworn and that this transcript is a true record of the testimony given by the witness.

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken. Further, I am not a relative or employee of any attorney of record in this cause, nor am I financially or otherwise interested in the outcome of the action.

Subscribed and sworn to by me this day, July 7, 2020.



Debbie D. Cunningham, CSR
Texas CSR 2065
Expiration: 6/30/2021
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Exhibit R

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LADDY CURTIS VALENTINE and RICHARD ELVIN KING, individually and on behalf of those similarly situated,	)	
Plaintiffs,	)	
v.	)	C.A. NO. 4:20-CV-01115
BRYAN COLLIER, in his official capacity, ROBERT HERRERA, in his official capacity, and TEXAS DEPARTMENT OF CRIMINAL JUSTICE,	)	
Defendants.	)	

ORAL DEPOSITION

MARVIN JONES

JULY 6, 2020

ORAL DEPOSITION OF MARVIN JONES, produced as a witness at the instance of the Defendants and duly sworn, was taken in the above-styled and numbered cause on the 6th day of July, 2020, from 12:11 p.m. to 2:25 p.m., before Dana Richardson, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the TDCJ-CID Wallace Pack Unit, 2400 Wallace Pack Rd., Navasota, Texas 77868, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

Q. (BY MR. MOLINA) Do you feel that they've put policies into place to attempt to protect you and the other inmates from COVID-19?

MR. RUDLOFF: Objection, calls for speculation.

You can answer, Mr. Jones.

A. There has been an attempt, I believe; but I don't -- I don't believe they've done everything that they could as far as -- as far as for us, no.

Q. (BY MR. MOLINA) What do you believe that the Pack Unit could do to further ensure your safety from COVID-19?

A. Well, as you know, I'm in a wheelchair. And so for us in wheelchairs in particular, we're in a situation of where our hands are never clean. So if they would put some type of protocol in place as far as to sanitize our hands in general, then that would help us tremendously because we're in a situation where we continuously have to roll through water. Feces laid in water, urine laid in water and things of that nature right there. And so if you know what a wheelchair looks like, then you know the wheelchair rings is what are hands are constantly coming into contact with as well as our tire. So anything we roll through, it gets on our hands and our clothing as well sometimes, for that

matter. So no matter if we wash our hands or not, we still have to touch the same rings that are -- and wheels that are contaminated with things that we roll through. As you know, being in a car, riding a bicycle, water goes on the tire and it spins off that tire and it splashes. And so it's going to always splash on us. And so any time we get back to our cubicle after touching our wheelchair, it's always contaminated. So they still haven't put anything into place as far as that right there for us.

Q. Is there any way to wash your hands in your cubicle?

A. No, sir.

Q. Okay. So other than hand sanitizer for persons using wheelchairs, is there anything else you think the Pack Unit could do to better -- or better ensure the safety of the inmates at the Pack Unit?

MR. RUDLOFF: Objection, misstates.

A. Ask again, please.

MR. RUDLOFF: You can answer, Mr. Jones.

Q. (BY MR. MOLINA) Yeah, I was just asking: Basically is there anything else? So you mentioned, you know, using hand sanitizer would be good for those people using it -- wheelchairs. Is there anything else you think TDCJ and the Pack Unit could do that they're

STATE OF TEXAS
COUNTY OF HARRIS

REPORTER'S CERTIFICATE

I, Dana Richardson, a Certified Shorthand Reporter in and for the State of Texas, do certify that this deposition transcript is a true record of the testimony given by the witness named herein, after said witness was duly sworn by me. The witness was not requested to review the deposition.

I further certify that I am neither attorney or counsel for, related to, nor employed by any parties to the action in which this testimony is taken and, further, that I am not a relative or employee of any counsel employed by the parties hereto or financially interested in the action.

I further certify that the amount of time used by each party at the deposition is as follows:

Mr. Ralph Molina - 01:33

SUBSCRIBED AND SWORN TO under my hand and seal of office on this the 7th day of July, 2020.

Dana Richardson, RPR, TX CSR 5386
Expiration: 01/31/22
Integrity Legal Support Solutions
Firm Registration No. 528
PO Box 245
Manchaca, Texas 78652
(512) 320-8690

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Laddy Curtis Valentine and Richard Elvin King, individually and on behalf of those similarly situated, Plaintiffs, v. Bryan Collier, in his official capacity, Robert Herrera, in his official capacity, and Texas Department of Criminal Justice, Defendants.	)	Case No. 4:20-cv-01115 Judge Keith Ellison

Order Granting Plaintiffs' Emergency Supplemental Motion for Certification of Two Additional Subclasses

The Court, having considered Plaintiffs' Emergency Supplemental Motion for Certification of Two Additional Subclasses, any opposition to the motion, and the applicable authorities hereby GRANTS the motion in its entirety.

IT IS SO ORDERED.

SIGNED this ____ day of _____, 2020.

_____
Judge Keith P. Ellison