

EXHIBIT J

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4 KEITH ROGERS, ET AL,)
5 PLAINTIFFS,)
6 -VS-) NO. 15-CV-11632
7 SHERIFF OF COOK COUNTY, ET AL,)
8 DEFENDANTS.)
9 DISCOVERY DEPOSITION OF
10 KEITH ROGERS
11 CHICAGO, ILLINOIS
12 OCTOBER 23, 2019
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22 ATKINSON-BAKER, INC.
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25 REPORTED BY: CHERYL LYNN MOFFETT, CSR NO. 084-002218
FILE NO. AD0AA0F

Keith Rogers
October 23, 2019

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9 Discovery deposition of KEITH ROGERS taken on
10 behalf of the Defendants at 50 West Washington Street,
11 Suite 2760, Chicago, Illinois, commencing at 2:07 p.m.,
12 on Wednesday, October 23, 2019, before Cheryl Lynn
13 Moffett, CSR No. 084-002218.

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Keith Rogers
October 23, 2019

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* * *

Keith Rogers
October 23, 2019

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1 for it?

2 A. I was taking it at home.

3 Q. When did that change? You said originally you
4 had to go to the clinic every day to pick up your dose.

5 A. They do that in stages. From going to the
6 clinic every day, the next step after that is three days
7 per week. And if you do well with that with your urine
8 drops and things of that nature, then they bumped it up
9 to a week. And then after a week it went to two weeks.
10 I was offered to go monthly, but I couldn't afford to pay
11 the fee of a monthly fee, so it's easier for me to do
12 every two weeks.

13 Q. When you first entered the Cook County jail on
14 January 20th, 2014, can you tell me what happened? What
15 happened? Where did you go?

16 A. Intake, Cook County intake.

17 Q. And what happened at intake?

18 A. You know, they take your name, you see a
19 doctor there. I told him about the Methadone and what
20 not. They gave me some kind of injection. I really
21 couldn't tell you what was in it, I don't know, but I was
22 under the understanding that it was to help, you know,
23 subdue the withdrawal symptoms I guess until you can get
24 some kind of dose or something.

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1 A. I couldn't tell you.

2 Q. Were you eating during that period of time?

3 A. I tried, but I couldn't.

4 Q. About how often did you -- were you eating
5 every day a little or describe it to me.

6 A. They would serve food. Sometimes I would go
7 to get it, most times not. When I did go to get it I
8 would take a bite or two, and that would be about it. I
9 couldn't stomach it.

10 Q. Were you able to keep down any liquids?

11 A. Yes and no. Would depend on, you know, how
12 the nausea would strike and how soon I drank something
13 compared to that.

14 Q. Other than the intake and when you first saw
15 the male doctor who gave you the dose of Methadone, did
16 you see any other medical staff during that period of
17 time?

18 A. No.

19 Q. Were you given any medication either at intake
20 or after prior to the Methadone?

21 A. I believe I was given something to help with
22 the nausea.

23 Q. Do you remember what it was?

24 A. No, I do not.