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Movement History Associated View

Inmate	Booking	Movement Date	From	To	Movement Reason	Movement Status
Montrell Carr	20140822144	10/3/2016 4:44 AM	In-Transit	In-Cell	RCDC Shipment	Pending
Montrell Carr	20140822144	10/3/2016 4:05 AM	In-Cell	In-Transit	RCDC Shipment	Pending
Montrell Carr	20140822144	9/30/2016 1:37 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/30/2016 1:16 PM	In-Transit	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	9/30/2016 7:26 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	9/27/2016 2:29 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/27/2016 2:22 PM	DOCCC8RDGESCNR	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	9/27/2016 7:31 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	9/27/2016 7:18 AM	In-Transit	DOCCC8RDGESCNR	Court Appearance	Pending
Montrell Carr	20140822144	9/25/2016 10:49 PM	DOCD8RCDCHOLD2	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/26/2016 6:11 PM	MAYWLOCKUP1	DOCD8RCDCHOLD2	Court Return	Pending
Montrell Carr	20140822144	9/26/2016 5:15 PM	MAYWLOCKUP1	MAYWLOCKUP1	Court Return	Pending
Montrell Carr	20140822144	9/26/2016 8:50 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	9/26/2016 7:47 AM	DOCD10-INTAKE	DOCD8RCDCHOLD2	Court Appearance	Pending
Montrell Carr	20140822144	9/26/2016 5:29 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	9/26/2016 5:25 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	9/26/2016 3:07 PM	DOCCC8RDGESCNR	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/26/2016 7:50 AM	In-Transit	DOCCC8RDGESCNR	Court Appearance	Pending
Montrell Carr	20140822144	9/26/2016 7:17 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	8/29/2016 2:38 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	8/29/2016 2:22 PM	DOCD8RCDCHOLD2	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	8/29/2016 1:55 AM	In-Transit	DOCD8RCDCHOLD2	Court Return	Pending
Montrell Carr	20140822144	8/29/2016 1:41 AM	MAYWLOCKUP2	In-Transit	Court Return	Pending
Montrell Carr	20140822144	8/29/2016 8:45 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	8/29/2016 7:38 AM	In-Transit	DOCD8RCDCHOLD2	Court Appearance	Pending
Montrell Carr	20140822144	8/29/2016 5:27 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	8/25/2016 1:35 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	8/25/2016 10:07 AM	In-Cell	In-Transit	Clinic	Pending
Montrell Carr	20140822144	7/8/2016 2:41 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	7/8/2016 12:20 PM	DOCCC8RDGESCNR	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	7/8/2016 7:18 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	7/8/2016 6:31 AM	In-Transit	DOCCC8RDGESCNR	Court Appearance	Pending
Montrell Carr	20140822144	7/6/2016 8:06 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	7/6/2016 5:28 PM	MAYWLOCKUP2	In-Transit	Court Return	Pending
Montrell Carr	20140822144	7/6/2016 9:00 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	7/6/2016 6:22 AM	In-Transit	DOCD8RCDCHOLD2	Court Appearance	Pending
Montrell Carr	20140822144	7/6/2016 5:30 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	6/14/2016 2:24 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/14/2016 1:50 PM	In-Cell	In-Transit	In Cell	Pending
Montrell Carr	20140822144	6/1/2016 12:56 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/1/2016 12:41 PM	DOCCC8RDGESCNR	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	6/1/2016 7:27 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	6/1/2016 6:50 AM	In-Transit	DOCCC8RDGESCNR	Court Appearance	Pending
Montrell Carr	20140822144	5/18/2016 1:54 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	5/18/2016 1:25 PM	DOCCC8RDGESCNR	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	5/18/2016 7:29 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	5/18/2016 7:21 AM	In-Transit	DOCCC8RDGESCNR	Court Appearance	Pending
Montrell Carr	20140822144	5/16/2016 9:08 PM	DOCD8RCDCHOLD2	In-Cell	In Cell	Pending
Montrell Carr	20140822144	5/16/2016 5:21 PM	MAYWLOCKUP2	DOCD8RCDCHOLD2	Court Return	Pending
Montrell Carr	20140822144	5/16/2016 8:26 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	5/16/2016 5:55 AM	DOCD10-INTAKE	DOCD8RCDCHOLD2	Court Appearance	Pending
Montrell Carr	20140822144	5/16/2016 5:29 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	5/16/2016 4:46 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	4/1/2016 1:02 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	4/1/2016 12:31 PM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	4/1/2016 11:20 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	3/28/2016 2:40 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	3/28/2016 1:25 PM	DOCCC8RDGESCNR	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	3/28/2016 7:32 AM	In-Transit	DOCCC8RDGESCNR	Court Appearance	Pending
Montrell Carr	20140822144	3/28/2016 7:27 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	3/24/2016 7:37 PM	DOCD8RCDCHOLD2	In-Cell	In Cell	Pending
Montrell Carr	20140822144	3/24/2016 4:40 PM	MAYWLOCKUP1	DOCD8RCDCHOLD2	Court Return	Pending
Montrell Carr	20140822144	3/24/2016 4:36 PM	MAYWLOCKUP2	MAYWLOCKUP1	Court Return	Pending
Montrell Carr	20140822144	3/24/2016 8:50 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	3/24/2016 7:21 AM	DOCD10-INTAKE	DOCD8RCDCHOLD2	Court Appearance	Pending
Montrell Carr	20140822144	3/24/2016 5:22 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	3/24/2016 4:36 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	1/25/2016 1:11 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	1/25/2016 1:58 AM	In-Transit	DOCD10-INTAKE	Court Return	Pending

Preview: Movement History Associated View

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Montrell Carr	20140822144	1/22/2016 3:52 PM	DOCD8RCDCHOLD2	In-Cell	In Cell	Pending
Montrell Carr	20140822144	1/22/2016 12:50 PM	In-Transit	DOCD8RCDCHOLD2	Court Return	Pending
Montrell Carr	20140822144	1/22/2016 11:46 AM	MAYWLOCKUP2	In-Transit	Court Return	Pending
Montrell Carr	20140822144	1/22/2016 9:00 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	1/22/2016 7:56 AM	DOCD10-INTAKE	DOCD8RCDCHOLD2	Clinic	Pending
Montrell Carr	20140822144	1/22/2016 5:32 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	1/22/2016 4:01 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	12/30/2015 4:40 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	12/30/2015 11:45 AM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	12/30/2015 10:18 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	12/28/2015 1:44 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	12/28/2015 12:19 PM	DOCCBRDGCSCNR	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	12/28/2015 7:52 AM	In-Transit	DOCCBRDGCSCNR	Court Appearance	Pending
Montrell Carr	20140822144	12/28/2015 7:23 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	12/14/2015 11:05 AM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	12/14/2015 8:10 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	12/8/2015 12:58 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	12/8/2015 12:45 PM	DOCD5POSTOE	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	12/8/2015 10:39 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	12/8/2015 10:38 AM	In-Transit	DOCD5POSTOE	Other	Pending
Montrell Carr	20140822144	11/17/2015 3:21 PM	DOCCBRDGCSCNR	In-Cell	In Cell	Pending
Montrell Carr	20140822144	11/17/2015 7:37 AM	In-Transit	DOCCBRDGCSCNR	Court Appearance	Pending
Montrell Carr	20140822144	11/17/2015 7:18 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	11/13/2015 7:56 PM	DOCD8RCDCHOLD2	In-Cell	In Cell	Pending
Montrell Carr	20140822144	11/13/2015 5:21 PM	MAYWLOCKUP1	DOCD8RCDCHOLD2	Court Return	Pending
Montrell Carr	20140822144	11/13/2015 4:16 PM	MAYWLOCKUP2	MAYWLOCKUP1	Court Return	Pending
Montrell Carr	20140822144	11/13/2015 8:21 AM	DOCD10-INTAKE	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	11/13/2015 5:28 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	11/13/2015 4:59 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	11/5/2015 11:34 AM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	11/5/2015 11:14 AM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	11/5/2015 9:40 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	10/3/2015 9:05 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	10/3/2015 9:04 PM	DOCD5POSTOE	DOCD10-INTAKE	Clinic	Pending
Montrell Carr	20140822144	10/3/2015 2:58 PM	In-Transit	DOCD5POSTOE	Other	Pending
Montrell Carr	20140822144	10/3/2015 2:31 PM	In-Cell	In-Transit	RDCD 10	Pending
Montrell Carr	20140822144	10/1/2015 1:20 AM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	10/1/2015 12:32 AM	In-Transit	DOCD10-INTAKE	OIV10 Transfer In	Pending
Montrell Carr	20140822144	9/30/2015 7:13 PM	In-Cell	In-Transit	RDCD 10	Pending
Montrell Carr	20140822144	9/29/2015 10:24 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/29/2015 8:16 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	9/28/2015 10:37 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/28/2015 11:51 AM	MAYWLOCKUP2	In-Transit	Court Return	Pending
Montrell Carr	20140822144	9/28/2015 9:02 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	9/28/2015 7:20 AM	In-Transit	DOCD8RCDCHOLD2	Court Appearance	Pending
Montrell Carr	20140822144	9/28/2015 5:03 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	9/23/2015 1:16 AM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/22/2015 8:38 PM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	9/16/2015 2:06 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	9/16/2015 11:43 AM	In-Cell	In-Transit	Other	Pending
Montrell Carr	20140822144	8/27/2015 12:47 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	8/27/2015 9:33 AM	In-Cell	In-Transit	In Cell	Pending
Montrell Carr	20140822144	8/27/2015 8:39 AM	In-Cell	In-Transit	In Cell	Pending
Montrell Carr	20140822144	8/27/2015 8:39 AM	In-Transit	In-Cell	Medical	Pending
Montrell Carr	20140822144	8/25/2015 12:35 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	8/25/2015 9:00 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	8/11/2015 12:38 PM	DOCCBRDGCSCNR	In-Cell	In Cell	Pending
Montrell Carr	20140822144	8/10/2015 11:08 PM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	8/10/2015 1:05 PM	DOCD8RCDCHOLD2	In-Cell	In Cell	Pending
Montrell Carr	20140822144	8/10/2015 12:21 PM	In-Transit	DOCD8RCDCHOLD2	Court Return	Pending
Montrell Carr	20140822144	8/10/2015 11:43 AM	MAYWLOCKUP2	In-Transit	Court Return	Pending
Montrell Carr	20140822144	8/10/2015 8:27 AM	In-Transit	DOCCBRDGCSCNR	Court Appearance	Pending
Montrell Carr	20140822144	8/10/2015 8:25 AM	DOCD8RCDCHOLD2	MAYWLOCKUP2	Court Appearance	Pending
Montrell Carr	20140822144	8/10/2015 7:08 AM	In-Transit	DOCD8RCDCHOLD2	Court Appearance	Pending
Montrell Carr	20140822144	8/9/2015 11:05 PM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	7/23/2015 2:32 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	7/23/2015 12:11 PM	In-Cell	In-Transit	Other	Pending
Montrell Carr	20140822144	7/21/2015 1:27 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	7/21/2015 12:13 PM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	7/21/2015 6:21 AM	In-Transit	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	7/16/2015 9:48 AM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	7/16/2015 9:01 AM	In-Transit	DOCD10-INTAKE	In Cell	Pending

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Montrell Carr	20140822144	7/16/2015 7:23 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	7/7/2015 9:13 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	7/7/2015 1:09 PM	DOCD2D1STAGE2	DOCD8RCDCLAS9	RCDC 10	Pending
Montrell Carr	20140822144	7/7/2015 1:09 PM	DOCD8RCDCLAS9	In-Transit	RCDC 10	Pending
Montrell Carr	20140822144	7/7/2015 11:20 AM	In-Transit	DOCD2D1STAGE2	DIV2 Transfer Out	Pending
Montrell Carr	20140822144	7/7/2015 7:40 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	6/28/2015 5:39 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/28/2015 4:51 PM	In-Cell	In-Transit	Visitation	Pending
Montrell Carr	20140822144	6/5/2015 4:20 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/5/2015 4:19 PM	In-Cell	In-Transit	In Cell	Pending
Montrell Carr	20140822144	6/5/2015 1:50 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/5/2015 10:38 AM	In-Cell	In-Transit	In Cell	Pending
Montrell Carr	20140822144	6/3/2015 1:32 AM	DOCD8RCDCLAS10	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/2/2015 7:45 PM	DOCD8RCDCLAS3	DOCD8RCDCLAS10	RCDC 2	Pending
Montrell Carr	20140822144	6/2/2015 5:54 PM	In-Transit	DOCD8RCDCLAS3	RCDC 10	Pending
Montrell Carr	20140822144	6/2/2015 3:09 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/2/2015 3:09 PM	In-Cell	In-Transit	In Cell	Pending
Montrell Carr	20140822144	6/2/2015 5:03 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	6/2/2015 12:57 AM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/2/2015 12:18 AM	In-Cell	In-Transit	DIV10 Transfer Out	Pending
Montrell Carr	20140822144	6/1/2015 1:50 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	6/1/2015 1:44 PM	DOCD8RCDCLAS2	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	6/1/2015 6:04 AM	DOCD10-INTAKE	DOCD8RCDCLAS2	Court Appearance	Pending
Montrell Carr	20140822144	6/1/2015 5:40 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	6/1/2015 4:02 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	5/18/2015 6:38 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	5/18/2015 4:22 PM	In-Cell	In-Transit	Clinic	Pending
Montrell Carr	20140822144	5/14/2015 9:19 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	5/14/2015 7:57 PM	In-Cell	In-Transit	RCDC 10	Pending
Montrell Carr	20140822144	5/4/2015 6:34 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	5/4/2015 3:31 AM	In-Cell	In-Transit	Clinic	Pending
Montrell Carr	20140822144	4/24/2015 12:47 AM	DOCD8RCDCLAS10	In-Cell	In Cell	Pending
Montrell Carr	20140822144	4/24/2015 12:22 AM	Bernard Mitchell Hospital	DOCD8RCDCLAS10	Housing	Pending
Montrell Carr	20140822144	4/23/2015 10:03 PM	In-Cell	Bernard Mitchell Hospital	Clinic	Pending
Montrell Carr	20140822144	4/21/2015 3:20 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	4/21/2015 3:03 PM	In-Transit	DOCD10-INTAKE	Clinic	Pending
Montrell Carr	20140822144	4/21/2015 7:11 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	4/20/2015 2:39 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	4/20/2015 2:19 PM	DOCD8RCDCLAS2	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	4/20/2015 7:46 AM	In-Transit	DOCD8RCDCLAS2	Court Appearance	Pending
Montrell Carr	20140822144	4/20/2015 5:16 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	4/17/2015 1:41 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	4/17/2015 10:29 AM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	4/17/2015 8:12 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	4/14/2015 12:54 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	4/14/2015 11:13 AM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	4/14/2015 8:26 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	3/26/2015 3:15 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	3/26/2015 3:02 PM	In-Transit	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	3/26/2015 7:22 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	3/12/2015 2:41 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	3/12/2015 2:27 PM	DOCD8RCDCLAS2	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	3/12/2015 7:00 AM	DOCD10-INTAKE	DOCD8RCDCLAS2	Court Appearance	Pending
Montrell Carr	20140822144	3/12/2015 5:51 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	3/12/2015 4:36 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	3/10/2015 8:34 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	3/10/2015 5:04 PM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	3/3/2015 6:49 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	3/3/2015 12:08 PM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	2/25/2015 4:55 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	2/25/2015 7:13 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	2/18/2015 6:51 PM	DOCD8RCDCLAS2	In-Cell	In Cell	Pending
Montrell Carr	20140822144	2/18/2015 5:37 PM	CTPCN2452BELM11	DOCD8RCDCLAS2	Court Return	Pending
Montrell Carr	20140822144	2/18/2015 10:54 AM	DOCD8RCDCLAS2	CTPCN2452BELM11	Court Appearance	Pending
Montrell Carr	20140822144	2/18/2015 10:14 AM	In-Transit	DOCD8RCDCLAS2	Court Appearance	Pending
Montrell Carr	20140822144	2/18/2015 9:33 AM	DOCD8RCDCLAS2	In-Transit	Clinic	Pending
Montrell Carr	20140822144	2/18/2015 8:31 AM	DOCD10-INTAKE	DOCD8RCDCLAS2	Clinic	Pending
Montrell Carr	20140822144	2/18/2015 5:27 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	2/18/2015 5:23 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	2/13/2015 12:16 AM	In-Cell	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	2/13/2015 12:04 AM	In-Transit	DOCD10-INTAKE	DIV10 Transfer In	Pending
Montrell Carr	20140822144	2/12/2015 11:39 PM	DOCD8RCDCLAS2	In-Transit	Other	Pending

Preview: Movement History Associated View

Page 4 of 5

Montrell Carr	20140822144	2/12/2015 9:19 PM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	2/7/2015 7:21 PM	In-Cell	In-Transit	In Cell	Pending
Montrell Carr	20140822144	2/7/2015 7:21 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	2/2/2015 2:20 PM	DOCD10-INTAKE	In-Cell	Clinic	Pending
Montrell Carr	20140822144	2/2/2015 12:09 PM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	2/2/2015 11:38 AM	DOCD10-INTAKE	In-Transit	In Cell	Pending
Montrell Carr	20140822144	2/2/2015 5:35 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	2/2/2015 5:30 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	1/30/2015 1:22 PM	In-Transit	In-Cell	Clinic	Pending
Montrell Carr	20140822144	1/30/2015 8:47 AM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	1/28/2015 2:41 PM	DOCD10-INTAKE	In-Cell	Clinic	Pending
Montrell Carr	20140822144	1/28/2015 2:05 PM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	1/28/2015 1:28 PM	DOCCMKBSMTCTRL	In-Transit	Clinic	Pending
Montrell Carr	20140822144	1/28/2015 12:56 PM	In-Cell	In-Transit	Medical	Pending
Montrell Carr	20140822144	1/28/2015 12:24 PM	In-Transit	DOCCMKBSMTCTRL	Clinic	Pending
Montrell Carr	20140822144	1/26/2015 5:21 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	1/26/2015 4:53 PM	In-Transit	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	1/26/2015 7:24 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	1/21/2015 1:55 PM	DOCD10-INTAKE	In-Cell	Clinic	Pending
Montrell Carr	20140822144	1/21/2015 1:06 PM	In-Transit	DOCD10-INTAKE	Court Return	Pending
Montrell Carr	20140822144	1/21/2015 7:23 AM	In-Cell	In-Transit	Clinic	Pending
Montrell Carr	20140822144	1/20/2015 2:46 PM	In-Transit	In-Cell	Clinic	Pending
Montrell Carr	20140822144	1/20/2015 8:36 AM	In-Cell	In-Transit	Other	Pending
Montrell Carr	20140822144	1/6/2015 7:39 PM	DOCD10-INTAKE	In-Cell	In Cell	Pending
Montrell Carr	20140822144	1/6/2015 8:15 AM	DOCD10-INTAKE	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	1/6/2015 5:19 AM	In-Transit	DOCD10-INTAKE	Court Appearance	Pending
Montrell Carr	20140822144	1/6/2015 4:45 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	12/22/2014 11:19 AM	DOCD10-INTAKE	In-Cell	Clinic	Pending
Montrell Carr	20140822144	12/22/2014 10:36 AM	In-Transit	DOCD10-INTAKE	In Cell	Pending
Montrell Carr	20140822144	12/22/2014 9:08 AM	In-Cell	In-Transit	Other	Pending
Montrell Carr	20140822144	11/3/2014 8:11 PM	In-Transit	In-Cell	In Cell	Pending
Montrell Carr	20140822144	11/3/2014 4:21 PM	In-Cell	In-Transit	Other	Pending
Montrell Carr	20140822144	11/3/2014 5:35 AM	In-Transit	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	11/3/2014 4:27 AM	In-Cell	In-Transit	Court Appearance	Pending
Montrell Carr	20140822144	10/23/2014 1:50 PM	In-Transit	In-Cell	Scanner	Completed
Montrell Carr	20140822144	10/23/2014 1:28 PM	Division 10 Intake	In-Transit	Scanner	Completed
Montrell Carr	20140822144	10/23/2014 12:54 PM	In-Cell	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	10/17/2014 5:35 AM	Rcdc 01	In-Cell	Scanner	Completed
Montrell Carr	20140822144	10/17/2014 12:07 AM	Tunnel Post Oe	Rcdc Transfer	Housing	Completed
Montrell Carr	20140822144	10/17/2014 12:07 AM	Rcdc Transfer	Rcdc 01	Housing	Completed
Montrell Carr	20140822144	9/12/2014 4:58 AM	In-Transit	Tunnel Post Oe	Scanner	Completed
Montrell Carr	20140822144	9/12/2014 4:09 AM	In-Cell	In-Transit	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 6:22 PM	Division 10 Intake	In-Cell	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 6:13 PM	Maywood B2 Male	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 4:41 PM	Court Maywood	Maywood B2 Male	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 9:19 AM	Rcdc Rear Sally	Court Maywood	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 9:19 AM	Rcdc Rear Sally	Court Maywood	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 8:20 AM	Tunnel Post Oe	Rcdc Rear Sally	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 6:09 AM	Division 10 Intake	Tunnel Post Oe	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 5:44 AM	In-Transit	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	9/10/2014 5:28 AM	In-Cell	In-Transit	Scanner	Completed
Montrell Carr	20140822144	9/3/2014 11:37 AM	Division 10 Intake	In-Cell	Scanner	Completed
Montrell Carr	20140822144	9/3/2014 11:26 AM	In-Cell	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	9/2/2014 9:00 AM	In-Cell	Parole Hearing	Other	Pending
Montrell Carr	20140822144	8/29/2014 3:50 PM	Division 10 Intake	In-Cell	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 3:23 PM	Tunnel Post Oe	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 3:10 PM	Maywood B2 Male	Tunnel Post Oe	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 11:51 AM	Maywood B1 Male	Maywood B2 Male	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 8:19 AM	Rcdc Rear Sally	Maywood B1 Male	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 7:25 AM	Tunnel Post Oe	Rcdc Rear Sally	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 6:17 AM	Division 10 Intake	Tunnel Post Oe	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 5:49 AM	In-Transit	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	8/29/2014 5:35 AM	In-Cell	In-Transit	Scanner	Completed
Montrell Carr	20140822144	8/27/2014 11:47 AM	Division 10 Intake	In-Cell	Scanner	Completed
Montrell Carr	20140822144	8/27/2014 10:28 AM	In-Transit	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	8/27/2014 10:15 AM	Tunnel Post Oe	In-Transit	Scanner	Completed
Montrell Carr	20140822144	8/27/2014 8:59 AM	Division 10 Intake	Tunnel Post Oe	Scanner	Completed
Montrell Carr	20140822144	8/27/2014 8:36 AM	In-Cell	Division 10 Intake	Scanner	Completed
Montrell Carr	20140822144	8/23/2014 12:40 AM	Div 10 Intake	In-Cell	Scanner	Completed
Montrell Carr	20140822144	8/23/2014 12:29 AM	Rcdc 10	Div 10 Intake	Housing	Completed
Montrell Carr	20140822144	8/22/2014 6:21 PM	Rcdc 01	Rcdc Transfer	Medical	Completed
Montrell Carr	20140822144	8/22/2014 6:21 PM	Rcdc Transfer	Rcdc 10	Medical	Completed

Montrell Carr	20140822144	8/22/2014 3:39 PM	Court Maywood	Rcdc 01	Housing	Completed
Montrell Carr	20140822144	8/22/2014 12:00 PM	M/Hld	Court Maywood	Scanner	Completed
Montrell Carr	20140822144	8/22/2014 12:00 PM	M/Hld	Court Maywood	Scanner	Completed
Montrell Carr	20140822144		In-Cell	All Property	Housing	Pending
Montrell Carr	20140822144		In-Cell	Rcdc Shipment	Other	Pending

Cook County Health and Hospitals System

1900 West Polk Street, Chicago, Illinois 60612

Patient Name: CARR, MONTRELL

Patient Type: Visit CHS

Birth Date: [REDACTED]

Gender: Male

Admission Date: 8/22/2014

Discharge Date:

FIN: 20140822144

MRN: 004762810c; 00672808z; 581974p

CMRN: 1009597374

Dental Outpt

Document Type:

Dental Outpt

Service Date/Time:

5/6/2015 12:05 CDT

Result Status:

In Progress

Perform Information:

TAYLOR DMD,BRENDA (5/6/2015 12:06 CDT)

Sign Information:

PATIENT REFUSED ON THE DAY OF SCHEDULED DENTAL APPOINTMENT. FORM SIGNED.

*Electronically Signed By: TAYLOR DMD, BRENDA**PAGER BUS: 773 505 7076*

Document Type:

Dental Outpt

Service Date/Time:

4/26/2016 12:37 CDT

Result Status:

In Progress

Perform Information:

TAYLOR DMD,BRENDA (4/26/2016 12:42 CDT)

Sign Information:

COMPREHENSIVE EXAM

MEDICAL AND DENTAL HX WNL, NOTED IN DENTAL CHART BPD 112/65. OH GOOD. EXISTING RESTORATIONS TEMPORARY AND PERMANENT. PATIENT HAS PAIN AREA OF #17/18. #17 IS LIKELY THE CAUSE. NO CARIES NOTED ON #18. STROGER REFERRAL FOR #16 AND #17. PATIENT STATES HE HAD A FILLING #30 BUT LOST IT. CAST RESTORATION INDICATED #30. ADVISED PATIENT. PALLIATIVE RX

#15 OCCLUSAL AMALGAM

#30 IRM (INTACT)

*Electronically Signed By: TAYLOR DMD, BRENDA**PAGER BUS: 773 505 7076*

Report Request ID: 37335476

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Facility: CHS

Location: 104C; 2; 1

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COOK COUNTY SHERIFF'S OFFICE
 (Oficina del Alguacil del Condado de Cook)

INMATE GRIEVANCE FORM
 (Formulario de Queja del Preso)


GRIEVANCE



NON-GRIEVANCE (REQUEST)

CONTROL #

20167043

INMATE ID#

672808

THIS SECTION IS TO BE COMPLETED BY INMATE SERVICES STAFF ONLY!

GRIEVANCE FORM PROCESSED AS:


EMERGENCY GRIEVANCE



GRIEVANCE



NON-GRIEVANCE (REQUEST)

Inmate #

0060

REFERRED TO:


ERMAK HEALTH SERVICES



SUPERINTENDENT



OTHER

16 AUG 19 AM

16 AUG 19 AM

16 AUG 19 AM

16 AUG 19 AM

16 AUG 19 AM

PRINT - INMATE LAST NAME (Apellido del Preso):

Carr

INMATE INFORMATION (Información del Preso)

PRINT - FIRST NAME (Primer Nombre):

Montrell

DIVISION (División):

10

LIVING UNIT (Unidad):

4C

INMATE BOOKING NUMBER (Número de identificación del detenido)

20142822112

DATE (Fecha):

8-15-16

INMATE'S BRIEF SUMMARY OF THE COMPLAINT (Breve Resumen de la Queja del Preso)

- An inmate wishing to file a grievance is required to do so within 15 days of the event he/she is grieving.
- Inmate Disciplinary Hearing Board decisions cannot be grieved or appealed through the use of an Inmate Grievance Request/Response/Appeal Form.
- When a grievance issue is processed as a NON-GRIEVANCE (REQUEST), an inmate may re-submit the grievance issue after 15 days to obtain a "Control Number" if there has been no response to the request or the response is deemed unsatisfactory.
- Only one (1) issue can be grieved per form.
- Un preso que desea llenar una queja, se le requiere que lo haga dentro de los 15 días después del incidente.
- Las decisiones del Comité Disciplinario de los presos, no podrán ser cuestionadas o Apeladas a través del uso del Formulario de Quejas/Respuesta/Forma de Apelación.
- Cuando una Queja se procesa como una QUEJA NO (PETICION), un preso podrá re-someter una Queja después de los 15 días para recibir un "Número de Control", ya sea porque no hay una respuesta o porque la respuesta es insatisfactoria.
- Sólo una queja por formulario.

DATE OF INCIDENT (Fecha Del Incidente)

8-1-16

TIME OF INCIDENT (Hora Del Incidente)

10:00 AM

SPECIFIC LOCATION OF INCIDENT (Lugar Especifico Del Incidente)

Div 10

This is the second grievance I put in regarding the dentist I've put in numerous medical request this company about my wisdom teeth to be extracted due to extreme pain they've taken me off the pain medication and I'm still in constant pain and I'm yet to go to the outside hospital and get them taken out, this is my second grievance and yet to get a response I just want the pain to stop.

ACTION THAT YOU ARE REQUESTING, THIS SECTION MUST BE COMPLETED (Acción que esta solicitada, Esta sección debe completarse)

I just want my tooth pulled and given pain meds
 I am able to get medical attention

IF YOU HAVE ELECTED TO SUBMIT YOUR GRIEVANCE FORM MORE THAN 2 DAYS SINCE WRITING AND/OR DATING IT ORIGINALLY, YOU WILL BE ASKED TO REVISE THE DATE AND INITIAL TO ACCURATELY REFLECT THE DAY YOU CHOSE TO SUBMIT THE FORM.

(SI ELEGIDO PRESENTAR SU QUEJA MAS DE 2 DIAS ANTES QUE CUANDO LA ENTREGA Y ELEGIO LA FECHA DESDE UN PRINCIPIO, ES NECESARIO QUE CAMBIE LA FECHA Y INCLUYA SUS INICIALES PARA SUBMITIR SU FORMA)

NAME OF STAFF OR INMATE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:
 (Nombre del personal o presos que tengan información)

INMATE SIGNATURE AND DATE (Firma del Preso/Fecha):

Montrell Carr 8-15-16

SUPERINTENDENT/DIRECTOR/DISENSEE OF A DIVISION/UNIT MUST REVIEW AND SIGN ALL GRIEVANCES ALLEGING STAFF USE OF FORCE, STAFF MISCONDUCT, AND EMERGENCY GRIEVANCES. IF THE INMATE GRIEVANCE IS OF A SERIOUS NATURE, THE SUPERINTENDENT MUST INITIATE IMMEDIATE ACTION.

CRW/PLATOON COUNSELOR (Print):
SIGNATURE:
DATE CRW/PLATOON COUNSELOR RECEIVED:
SUPERINTENDENT/DIRECTOR/DISENSEE (Print):
SIGNATURE:
DATE REVIEWED:

(FCN-40)(SEP 14)

(WHITE COPY - INMATE SERVICES)

(YELLOW COPY - CRW/PLATOON COUNSELOR)

(PINK COPY - INMATE)

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 Plaintiffs' Exhibit
 Carr Grievance 03
 Page 1 of 2

CARR 12


COOK COUNTY SHERIFF'S OFFICE
 (Oficina del Alguacil del Condado de Cook)

INMATE GRIEVANCE RESPONSE / APPEAL FORM
 (Petición de Queja del Preso / Respuesta / Forma de Apelación)

☒ GRIEVANCE ☐ NON-GRIEVANCE (REQUEST)

CONTROL #

2016 7043

INMATE LAST NAME (Apellido del Preso):

CARR

INMATE INFORMATION (Información del Preso)

INMATE FIRST NAME (Primer Nombre):

Montrell

ID Number (Número de identificación):

20140822140

GRIEVANCE / NON-GRIEVANCE (REQUEST) REFERRAL & RESPONSE

CRW / PLATOON COUNSELOR'S SUMMARY OF THE COMPLAINT

050 Dental Treatment

IMMEDIATE CRW / PLATOON COUNSELOR RESPONSE (if applicable):

CRW / PLATOON COUNSELOR REFERRED THIS GRIEVANCE / REQUEST TO (Example: Supervisor, Dermak Health services, Personnel):

Carmax

DATE REFERRED:

8/13/16

RESPONSE BY PERSONNEL HANDLING REFERRAL:

You are scheduled for dental extraction at oral surgery at
Stooge in September.

PERSONNEL RESPONDING TO GRIEVANCE (Print):

Susan Shebel

SIGNATURE:

Susan Shebel

DIV. / DEPT.

DATE:

9/9/16

Superintendents of a division/unit must review all responses to grievances alleging staff use of force, staff misconduct and emergency grievances.

SUPERINTENDENT / DIRECTOR / DESIGNEE (Print):

SIGNATURE:

DIV. / DEPT.

DATE:

1/1

NON-GRIEVANCE (REQUEST) SUBJECT CODE (Check applicable box):

☐ GRIEVANCE SUBJECT CODE:☐ NON-GRIEVANCE SUBJECT CODE:

INMATE SIGNATURE (Firma del Preso):

Montrell Carr

DATE RESPONSE WAS RECEIVED:
(Fecha en que la respuesta fue recibida):

9/15/16

INMATE'S REQUEST FOR AN APPEAL (Solicitud de Apelación del Preso)

* To exhaust administrative remedies, appeals must be made within 14 days of the date the inmate received the response.

* Las apelaciones tendrán que ser sometidas dentro de los 14 días; a partir que el preso recibió la respuesta para agotar todas las posibles respuestas administrativas.

DATE OF INMATE'S REQUEST FOR AN APPEAL: (Fecha de la solicitud de la apelación del detenido):

9/15/16

INMATE'S BASIS FOR AN APPEAL (Base del detenido para una apelación):

I been waiting for 4 months I am in pain I need attention
asap I been waiting patient for along time I can't sleep
or eat on my right side and its starting to hurt on my left side to

 ADMINISTRATOR / DESIGNEE'S ACCEPTANCE OF INMATE'S APPEAL?
 ¿Apelación del detenido aceptada por el administrador o su designado(a)?

Yes (Si)

No

☐☒

ADMINISTRATOR / DESIGNEE'S DECISION OR RECOMMENDATION (Decisión o recomendación por parte del administrador o su designado(a)):

Response stands appt changed to October

ADMINISTRATOR / DESIGNEE (Administrador o su Designado(a)):

Susan Shebel

SIGNATURE (Firma del Administrador o su Designado(a)):

Susan Shebel

DATE (Fecha):

9/30/16

INMATE SIGNATURE (Firma del Preso):

Mailed to IDOC (Under name Venture Robinson)

DATE INMATE RECEIVED APPEAL RESPONSE:
(Fecha en que el Preso recibió respuesta a su apelación):

10/3/16

FCN-48 (Rev. 08/14)

WHITE COPY - PROGRAM SERVICES

 Plaintiffs' Exhibit
 Carr Grievance 03
 Page 2 of 2

YELLOW COPY - CRW / PLATOON COUNSELOR

PINK COPY - INMATE

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CARR 13

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOHN SMEN TEK, MALCOLM PATTON,)
MELVIN PHILLIPS, RODELL SANDERS, and)
FRANK POWICKI,)
Plaintiffs,)
vs.) No. 09 C 529
SHERIFF OF COOK COUNTY and COOK)
COUNTY, ILLINOIS,) Chicago, Illinois
Defendants.) June 3, 2014
9:00 A.M.

VOLUME 2A
TRANSCRIPT OF PROCEEDINGS - Bench Trial
BEFORE THE HONORABLE JOAN HUMPHREY LEFKOW

APPEARANCES:

For the Plaintiffs: KENNETH N. FLAXMAN, P.C.
200 South Michigan Avenue
Suite 201
Chicago, Illinois 60604-6107
BY: MR. KENNETH N. FLAXMAN

THOMAS G. MORRISSEY, LTD.
10249 South Western Avenue
Chicago, Illinois 60643
BY: MR. THOMAS GERARD MORRISSEY
MR. PATRICK WILLIAM MORRISSEY

PAMELA S. WARREN, CSR, RPR
Official Court Reporter
219 South Dearborn Street
Room 1928
Chicago, Illinois 60604
(312) 294-8907

1 MR. T. MORRISSEY: We're going to call Mr. Scott to
2 the stand.

3 (Witness sworn.)

4 QUENTIN SCOTT, PLAINTIFFS'S WITNESS, DULY SWORN

5 DIRECT EXAMINATION

6 BY MR. T. MORRISSEY:

7 Q. Good morning, Mr. Scott.

8 A. Good morning.

9 Q. Will you please tell the Court your full name for the
10 record.

11 A. Quentin Scott.

12 Q. And, Mr. Scott, were you at one point an inmate at the Cook
13 County Jail?

14 A. Yes.

15 Q. When did you enter the Cook County Jail, sir?

16 A. June 23rd, 2013.

17 Q. And you recently were released from the Cook County Jail?

18 A. Yes.

19 Q. When was that, sir?

20 A. May the 22nd, 2014.

21 Q. What caused you to be released from the Cook County Jail?

22 A. I was found not guilty.

23 Q. Now calling your attention to August of 2013, did you have
24 an occasion to have a problem with your tooth?

25 A. Yes.

1 MR. T. MORRISSEY: Your Honor, may I approach the
2 witness?

3 THE COURT: Yes.

4 BY MR. T. MORRISSEY:

5 Q. Mr. Scott, I'm going to show you a series of exhibits that
6 have marked as Plaintiffs's Exhibit Revised Number 82. I'd ask
7 you to take a look at those documents.

8 MR. GALLAGHER: Do you have a copy?

9 MR. T. MORRISSEY: You have them.

10 BY MR. T. MORRISSEY:

11 Q. Taking a look at --

12 MR. T. MORRISSEY: Does the Court have --

13 THE COURT: Yes.

14 BY MR. T. MORRISSEY:

15 Q. Taking a look at a document marked 8-6-13. It's a Health
16 Service Request Form. 82 -- Exhibit 82, page 4. Do you see
17 that document, sir?

18 A. Yes.

19 Q. Do you recognize any writing on that document?

20 A. Yes, that's my handwriting.

21 Q. What is a Health Service Request Form, sir?

22 A. It's something you fill out if you want -- if you need
23 medical attention, dental attention or anything like that.

24 Q. Why did you fill out that form on August 6, 2013?

25 A. I had a toothache.

1 Q. Can you describe the type of toothache you had?

2 A. I had -- my Number 1 wisdom tooth had a hole in it.

3 Q. Okay. And can you look on the form, does it -- did you
4 make any writing in regards to dental on that form?

5 A. Yes, I put on there my tooth hurts like hell and I'm having
6 trouble eating and in pain.

7 Q. What did you mean by it hurt like hell?

8 A. It throbbed all night long.

9 Q. When you said you were having trouble eating, you didn't
10 fast for a year, did you?

11 A. No.

12 Q. But how did it cause you discomfort when you were eating?

13 A. Because when you would eat, it would hurt. And the hole
14 that it had in it would fill up, and it would just, like, hurt
15 the nerves or whatever the problem was. It just hurts like
16 hell.

17 Q. Okay. Now on August 8th, 2013, you actually went to the
18 dental clinic in Division 11, correct?

19 A. Yes.

20 Q. And did you see a dentist there?

21 A. Yes.

22 Q. Can you describe the dentist you saw that day?

23 A. He was an African American in his late 50s.

24 Q. Do you recall his name?

25 A. I think it was Dennis Thompson or something like that --

1 something like that.

2 Q. What did you observe the dentist do?

3 A. He had examined my mouth, and he's actually the one that
4 told me I had the hole in the tooth and I needed to go to
5 Stroger to have oral surgery.

6 Q. Okay. Did you describe to the dentist, Dr. Townsend,
7 what was -- why you were in the dental clinic?

8 A. Yes, I told him I had a toothache. And he examined my
9 mouth.

10 Q. Okay. I'm showing you the next page, which is page 8.
11 That's a general consent to dental treatment.

12 Do you see that document?

13 A. Yes.

14 Q. And do you see the diagnosis of your condition?

15 A. Yes.

16 Q. And what did Dr. Townsend diagnose your condition as?

17 A. He referred me to go to oral surgery at Stroger Hospital.

18 Q. And did you actually sign that document, that consent?

19 A. Yes.

20 Q. I'd ask you to take a look at the next document, which is
21 Exhibit 82, page 13. It's a Health Service Request dated
22 8-10-13.

23 Do you see that document?

24 A. Yes.

25 Q. And is there any writing on that that you recognize?

1 A. Yes.

2 Q. Is that your writing?

3 A. Yes.

4 Q. Why did you fill out that form, sir?

5 A. Because I haven't gotten -- received the pills that
6 Dr. Thompson prescribed for me for the toothache until I get
7 the oral surgery. I haven't received the pills.

8 Q. And did you also mark under dental what was causing you
9 pain?

10 A. Yes.

11 Q. What did you say?

12 A. My tooth. My tooth still hurts, and I didn't get my pills
13 the doctor promised me.

14 Q. Now I'm calling your attention to the next document in
15 Group Exhibit Number 80 -- 83.

16 THE COURT: Page what?

17 MR. T. MORRISSEY: It's Exhibit 83, your Honor. Page
18 1 of 6.

19 MR. FLAXMAN: 80 --

20 MR. T. MORRISSEY: It's --

21 MR. FLAXMAN: 82.

22 MR. T. MORRISSEY: No, it's 83. The grievances are --
23 oh, did you --

24 MR. FLAXMAN: Oh, no, no, no, you're right, I'm sorry.

25 MS. HANNON: I'm sorry, what is 83?

1 MR. T. MORRISSEY: It's a group of exhibits that are
2 grievances.

3 Do you have it?

4 Does the Court have the grievances? Could we
5 present --

6 MR. FLAXMAN: It should be in the -- in the tab. It's
7 Tab 83, Judge.

8 THE COURT: I had -- my numbers end at 75.

9 MR. FLAXMAN: We have two volumes of --

10 THE COURT: Correct. All right.

11 MR. T. MORRISSEY: Does the Court have it now?

12 THE COURT: I do.

13 BY MR. T. MORRISSEY:

14 Q. Looking at page 1 of Exhibit 98, sir, do you recognize that
15 document?

16 A. Yes.

17 Q. What is that document?

18 A. This is a grievance that you write if you have a problem,
19 if something hasn't been taken care of, you fill this out for
20 your counselor, and he go and do whatever he do with it.

21 Q. Okay. So normally for medical and dental problems, is it
22 your understanding as a former inmate that you fill out Health
23 Service Requests?

24 A. Yes.

25 Q. And it was -- you took the extraordinary step in September

1 to fill out a grievance?

2 A. Yes.

3 Q. And what did you write in that grievance, sir?

4 A. I wrote: As of 9-5-13 I haven't received any pain
5 medication. And I am waiting for oral surgery. I have been
6 scheduled for next month, which seems very untimely, but this
7 when I am scheduled. Meantime, I do not have any pain
8 medication to aide me with this severe pain. I can't lie down,
9 have difficulty eating, and I have severe headaches. I need
10 medications.

11 Q. Now, Mr. Scott, in Division 11, do they have a box in a --
12 in your tier to put grievances?

13 A. Yes.

14 Q. And did you put the grievance in the box on September
15 11th --

16 A. No, not -- not the grievances, the medical request forms
17 goes in the box. The grievances go to the counselor or the
18 social worker that comes around.

19 Q. Okay. And if you look down at the bottom of that page,
20 there's a date in which the counselor picked up with the
21 grievance, right?

22 A. Yes.

23 Q. And that's September 17, 2013.

24 A. Yes.

25 Q. So to your recollection, the social worker or counselor

1 didn't pick it up for six days.

2 A. Right. Correct.

3 Q. Now on the next page of -- of the grievance, on page 2, you
4 received a response from that grievance, correct?

5 A. Yes.

6 Q. And that was tendered back to you on October 24, 2013.

7 A. Yes.

8 Q. And did you put your signature next to that line?

9 A. Yes.

10 Q. And what did the -- what was the response by the county,
11 Cermak, to your -- your grievance?

12 A. It had told me that I was scheduled for my -- to have oral
13 surgery.

14 Q. Can you look at that form, sir. Do you see it?

15 A. Oh, this is the one that received the medications on 9-23.
16 That's ordered by the dentist.

17 Q. So on 9-23-2013, the nurse manager finally arranged for you
18 to get medication.

19 A. Yes.

20 Q. And that's the medication that Dr. Townsend ordered on
21 August 6th?

22 A. Yes.

23 Q. And then it mentions you have a dental appointment on
24 September 23rd, correct?

25 A. Correct.

1 Q. Do you recall seeing a dentist on September 23rd?

2 A. Yes.

3 Q. And you don't recall who the dentist was, do you?

4 A. No, it was at Stroger Hospital.

5 Q. No. On September 23rd did you see a dentist in Division
6 11?

7 A. Oh, yeah. Yes, I seen him.

8 Q. And what did you tell the dentist when you saw him on
9 September 23rd, 2013?

10 A. I told him that I was still on pain, and I had -- my tooth
11 was very much in pain, so I had put a request form to go down.

12 MR. T. MORRISSEY: Can I approach the witness, your
13 Honor?

14 THE COURT: Yes.

15 MR. T. MORRISSEY: Thank you, your Honor.

16 BY MR. T. MORRISSEY:

17 Q. Exhibit 82, page 10.

18 And do you know if the dentist made any record of
19 what you told him on that date? I'm showing you what --

20 MS. HANNON: Objection. Beyond the scope of this
21 witness's knowledge.

22 BY MR. T. MORRISSEY:

23 Q. Can you read the -- the comment in the notes there.

24 THE COURT: Just a minute.

25 BY THE WITNESS:

1 A. Yes. Still in moderate --

2 THE COURT: Just a minute, Mr. Scott.

3 MS. HANNON: The objection is to the question, do you
4 know whether the doctor made a note?

5 THE COURT: Right. I mean, he's not qualified to
6 testify about the records of the hospital.

7 BY MR. T. MORRISSEY:

8 Q. Have you seen the record that was prepared by the dentist
9 on September 23rd?

10 MS. HANNON: Same objection.

11 THE COURT: What are you offering it for?

12 MR. T. MORRISSEY: Well, I'm offering it to the extent
13 that he's testifying that he made comments to the dentist in
14 regards to the pain that he was suffering at that time, your
15 Honor. And these documents are already in evidence.

16 THE COURT: All right. So -- well, actually you could
17 ask him what comments he made. And if he can't remember, you
18 might refresh his recollection with this notation.

19 THE WITNESS: Okay.

20 BY MR. T. MORRISSEY:

21 Q. Do you recall specifically what you told the dentist?

22 A. No.

23 Q. Would looking at the dentist record refresh your memory?

24 A. Yes.

25 Q. Will you please take a look at that document.

1 A. Still in moderate, severe pain.

2 Q. Does that refresh your memory?

3 A. Yes.

4 Q. And what -- what do you recall telling the dentist on
5 September 23rd?

6 A. That I need my tooth pulled. It hurts, it hurts.

7 Q. Okay. Now on November 5th, 2013, you actually went to
8 Stroger, correct?

9 A. Yes.

10 Q. What happened when you went to Stroger on November 5th?

11 A. They took an x-ray of it.

12 Q. Did they provide any pain medication?

13 A. No.

14 Q. Did they provide any treatment?

15 A. No.

16 Q. You filed several other Health Service Request Forms,
17 correct?

18 A. Yes.

19 MR. T. MORRISSEY: May I approach the witness?

20 THE COURT: Yes.

21 MR. T. MORRISSEY: May I remove the other exhibits
22 from the stand, your Honor?

23 BY MR. T. MORRISSEY:

24 Q. You see that you filed a series of Health Service Requests
25 in November of 2013, specifically on November 6th, 7th, and

1 November 15th.

2 Now I'll call your attention to page --

3 A. Page 39?

4 Q. -- page 36 of Exhibit 82.

5 Do you see that form, sir?

6 A. Yes.

7 Q. And page 39 of Exhibit 82.

8 A. Yes.

9 Q. And why did you file those Health Service Requests, sir?

10 A. I was still having a toothache. My tooth was still in
11 pain. And I figured if I get their attention, I would get it
12 pulled, but evidently it didn't.

13 Q. Calling your attention back to another grievance you filed
14 on November 18th, 2013, it's Plaintiffs's Exhibit 83, page 3 of
15 6.

16 Do you see that document?

17 A. Yes.

18 Q. Why did you fill that grievance out, sir?

19 A. Because I still haven't got the attention of getting my
20 tooth pulled. I wanted it to -- to get pulled. And the only
21 way I could get to the dentist is to write a grievance and
22 thinking maybe they'll call me and have it pulled out to take
23 the pain away. It hurts.

24 Q. And if we flip the page to page 4 of Exhibit 83, do they
25 respond to that grievance that you filed on November 18th in

1 regards to a dental appointment?

2 A. Yes.

3 Q. They put it over to again to 12-13 --

4 A. Right.

5 Q. -- 2013?

6 A. Yes.

7 Q. And you were in pain?

8 A. Yes, the whole time.

9 Q. Calling your attention to another grievance you filed on
10 August 8th, 2013. It's page 5 of 6 of Group Exhibit 83.

11 A. Yes.

12 Q. Why did you submit that one?

13 A. Same thing, it's concerning my toothache which has not been
14 addressed.

15 MR. T. MORRISSEY: I'm sorry -- I'm sorry I said --
16 correct the record. I said December -- I said August --
17 December 8th, 2013.

18 BY MR. T. MORRISSEY:

19 Q. Were you in pain in December of 2013?

20 A. Yes.

21 Q. What type of pain were you in in December of 2013?

22 A. Severe pain.

23 Q. Now eventually you did see a dentist again on December
24 20th, 2013, correct?

25 A. Yes.

1 Q. And was that a Dr. Juska?

2 A. Yes.

3 Q. What type of treatment did Dr. Jus- -- what did Dr. Juska
4 do on December 20th, 2013?

5 A. He prescribed me more medications and antibiotics.

6 Q. Did he -- did he say anything to you in regards to that
7 referral that was made back in August?

8 A. No.

9 Q. Did he offer to do something on that day, on December of
10 2013?

11 A. He asked -- he wanted to pull my tooth, but he wasn't
12 equipped to do it, so that's why I was referred to Stroger.

13 Q. Had you been advised by other dentists that you needed to
14 have an oral surgeon?

15 A. Yes.

16 Q. And did you have a comment or comments with anybody else in
17 the dental clinic that day?

18 A. His assistant told me -- she said he can't pull your tooth
19 because he's not -- he's not -- don't have the right equipment
20 to pull it. And if he pull it, if he try to pull and break it,
21 you're going to be in more pain than you would -- than you are
22 now.

23 Q. Now after that did you file other Health Service Request
24 Forms in January and February of 2014?

25 A. Yes.

1 Q. And finally on March 28th, 2014, were you brought over to
2 Stroger?

3 A. Yes.

4 Q. And what happened at Stroger at that day?

5 A. He took all of ten minutes to pull two teeth to stop the
6 pain that I was having.

7 Q. Which -- which teeth did he pull?

8 A. The Number 1 and whatever the other -- the wisdom, he
9 pulled both of them out.

10 Q. And after the two teeth were extracted, were you in any
11 pain after that?

12 A. No.

13 MR. T. MORRISSEY: If I could have a moment, your
14 Honor.

15 (Brief interruption.)

16 BY MR. T. MORRISSEY:

17 Q. Having been a resident of Cook County Jail for nine months,
18 the defendants said that on their opening statement that they
19 have excellent dental care.

20 Would you agree with that comment?

21 A. No way.

22 Q. Why not?

23 A. It took them nine months to pull two teeth that took ten
24 minutes.

25 MR. T. MORRISSEY: I have nothing further, your Honor.

* Auth (Verified) *



Cermak Health Services of Cook County
2800 S. California Avenue
Chicago, IL 60608

GENERAL CONSENT TO DENTAL TREATMENT

PATIENT NAME: Scott, Quentin CCDOC: 20130624121
DATE: 8-8-13 TIME: AM PM: MR #:

Quentin Scott do hereby consent to general dental treatment.

A diagnosis of my condition as

DMR Ref to O.S. for
scf @ I

has been explained to me by Dr. [Signature] and the following general
course of treatment explained to me:

The following alternative course(s) of treatment have been discussed with me by said dentist:

No guarantee or assurances have been given me as to any result to be obtained. I have been
advised only that the course of treatment explained to me and hereby consented to represents
the sound dental judgment of Dr. [Signature]

[Signature]
(Patient or person legally authorized to sign consent)

[Signature] 20130624121
(Witness)



Form 6 6504 Rev. May, 2003

PATIENT LOG



Cook County Health and Hospitals System

1900 West Polk Street, Chicago, Illinois 60612

Patient Name: SCOTT, QUINTIN

Patient Type: Visit CHS

Birth Date: 2/1/1988

Gender: Male

Admission Date: 6/24/2013

Discharge Date:

FIN: 20130624121

MRN: 00010535z; 004938848c

CMRN: 1011320283

Outpt Dental CHS

Document Type: Outpt Dental CHS
 Service Date/Time: 10/18/2013 12:15 CDT
 Result Status: Auth (Verified)
 Perform Information: JUSKA DMD,TOMAS (10/18/2013 12:15 CDT)
 Sign Information: JUSKA DMD,TOMAS (10/18/2013 12:15 CDT)

Dental Examination Entered On: 10/18/2013 12:17
Performed On: 10/18/2013 12:15 by JUSKA DMD, TOMAS

Dental Examination

Dental Chief Complaint : pt was brought back by the officer and nurse Santos - they informed that patients antibiotics which were given out last week (thursday) by Dr. Townsend were stolen. Rx for amoxicillin given.

Medical Record Reviewed : Yes

JUSKA DMD, TOMAS - 10/18/2013 12:15

Dental Treatment Rendered

Dental Visit : Limited Oral Examination - Problem Focus

Dental Disposition : Patient Return Treatment

Dental F/U Date : 11/1/2013

Dental F/U Priority : Routine

JUSKA DMD, TOMAS - 10/18/2013 12:15

Document Type: Outpt Dental CHS
 Service Date/Time: 12/20/2013 13:21 CST
 Result Status: Auth (Verified)
 Perform Information: JUSKA DMD,TOMAS (12/20/2013 13:21 CST)
 Sign Information: JUSKA DMD,TOMAS (12/20/2013 13:21 CST)

Dental Examination Entered On: 12/20/2013 13:24
Performed On: 12/20/2013 13:21 by JUSKA DMD, TOMAS

Dental Examination

Dental Chief Complaint : pt presented for follow up after his visit to Stroger. He says only xrays were taken last time and he is still in pain

Medical Record Reviewed : Yes

JUSKA DMD, TOMAS - 12/20/2013 13:21

Dental Treatment Plan**DTP Grid**

<i>Tooth :</i>	1
<i>Dental Surgical :</i>	Surgical Removal of Erupted Tooth

Report Request ID: 11201883

Page 125 of 206

Facility: CHS

Location: 113BG; 410; 2

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Cook County Health and Hospitals System

1900 West Polk Street, Chicago, Illinois 60612

Patient Name: SCOTT, QUINTIN

Patient Type: Visit CHS

Admission Date: 6/24/2013

MRN: 00010535z; 004938848c

Birth Date: [REDACTED]

Discharge Date:

Gender: Male

FIN: 20130624121

CMRN: 1011320283

Outpt Dental CHSJUSKA DMD,
TOMAS -
12/20/2013 13:21**Dental Treatment Rendered***Dental Visit :* Limited Oral Examination - Problem Focus*DE Dental RX :* Amoxicillin 500mg*Dental Education :* Prescription Instruction Given, Other: pt informed that his request to go to stroger was resubmitted. He did not want to get the tooth extracted at the clinic here. Pt informed to put HSRF if he wants to get it done here at the clinic.*NV: Ext #1. TJ**Dental Disposition :* Patient Return Treatment*Dental F/U Date :* 1/3/2014*Dental F/U Priority :* Routine

JUSKA DMD, TOMAS - 12/20/2013 13:21

Document Type:

Outpt Dental CHS

Service Date/Time:

3/27/2014 13:16 CDT

Result Status:

Auth (Verified)

Perform Information:

JUSKA DMD,TOMAS (3/27/2014 13:16 CDT)

Sign Information:

JUSKA DMD,TOMAS (3/27/2014 13:16 CDT)

Dental Examination Entered On: 03/27/2014 13:18
Performed On: 03/27/2014 13:16 by JUSKA DMD, TOMAS**Dental Examination***Dental Chief Complaint :* pt referred to OS at stroger. Pt wants to get his tooth ext before doing anything else. Rescheduled.*Medical Record Reviewed :* Yes

JUSKA DMD, TOMAS - 03/27/2014 13:16

Dental Treatment Rendered*Dental Education :* Other: NV: post op after tooth ext at stroger. and comp exam*Dental Disposition :* Patient Return Treatment*Dental F/U Date :* 4/3/2014*Dental F/U Priority :* Routine

JUSKA DMD, TOMAS - 03/27/2014 13:16

Report Request ID: 11201883

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Facility: CHS

Location: 113BG; 410; 2

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COOK COUNTY SHERIFF'S OFFICE
(Oficina del Alguacil del Condado de Cook)
INMATE GRIEVANCE FORM
(Formulario de Queja del Preso)

DIV 11-19

☒ GRIEVANCE ☐ NON-GRIEVANCE (REQUEST)

CONTROL #

2013X5325V

I This section is to be completed by Program Services staff - ONLY ! (! Para ser llenado solo por el personal de Program Services !)

GRIEVANCE FORM PROCESSED AS:

- ☐ EMERGENCY GRIEVANCE
☒ GRIEVANCE
☐ NON-GRIEVANCE (REQUEST)

Program Services Supervisor Approving Non-Grievance (Request) Signature

REFERRED TO:

- ☒ CERMAK HEALTH SERVICES
☐ SUPERINTENDENT: _____
☐ OTHER: _____

INMATE INFORMATION (Información del Preso)

PRINT - INMATE LAST NAME (Apellido del Preso): Scott	PRINT - FIRST NAME (Primer Nombre): Quintin	ID Number (# de identificación): 2030624121
DIVISION (División): DIV-11	LIVING UNIT (Unidad): B6 410	DATE (Fecha): 11, 18, 13

INMATE'S BRIEF SUMMARY OF THE COMPLAINT (Breve Resumen de los Hechos del Preso):

- * An inmate wishing to file a grievance is required to do so within 15 days of the event he/she is grieving.
- * Inmate Disciplinary Hearing Board decisions cannot be grieved or appealed through the use of an Inmate Grievance Request/Response/Appeal Form.
- * When a grievance issue is processed as a NON-GRIEVANCE (REQUEST), an inmate may re-submit the grievance issue after 15 days to obtain a "Control Number" if there has been no response to the request or the response is deemed unsatisfactory.
- * Un preso que desea llenar una queja, se le requiere que lo haga dentro de los 15 días después del incidente.
- * Las decisiones del Comité Disciplinario de los presos, no podrán ser cuestionadas o Apeladas a través del uso del Formulario de Quejas/Respuesta/Forma de Apelación.
- * Cuando una Queja se procesa como una QUEJA NO (PETICION), un preso podría re-someter una Queja después de los 15 días para recibir un "Numero de Control", ya sea porque no hay una respuesta o porque la respuesta es insatisfactoria.

PLEASE INCLUDE: Date of Incident - Time of Incident - Specific Location of Incident
(Por Favor, Incluya: Fecha Del Incidente - Hora Del Incidente - Lugar Especifico Del Incidente)

This grievance is to inform: My dental problem^{es} problem has not been addressed. I have been very patient concerning the time I have waited for services. My problem is not being addressed in a reasonable timely matter. It has been over three (3) months since I started this process. I am suffering... I am in pain, can't lie down can't eat properly, and have frequent headaches. I need this situation solve AS soon as possible!!! I need Oral Surgery.

ACTION THAT YOU ARE REQUESTING (Acción que esta solicitado):

ADMINISTRATIVE
13 NOV 22 PM

NAME OF STAFF OR INMATE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:
(Nombre del personal o presos que tengan información:)

INMATE SIGNATURE (Firma del Preso):

SUPERINTENDENTS/DIRECTORS/DESIGNEES OF A DIVISION/UNIT MUST REVIEW AND SIGN ALL GRIEVANCES ALLEGING STAFF USE OF FORCE, STAFF MISCONDUCT, AND EMERGENCY GRIEVANCES. IF THE INMATE GRIEVANCE IS OF A SERIOUS NATURE, THE SUPERINTENDENT MUST INITIATE IMMEDIATE ACTION.

CRW/PLATOON COUNSELOR (Print): J. Morales	SIGNATURE: 	DATE CRW/PLATOON COUNSELOR RECEIVED: 11.21.13
SUPERINTENDENT/DIRECTOR/DESIGNEE (Print):	SIGNATURE: 	DATE REVIEWED: App, 28

Plaintiffs' Exhibit
ScottGrievances 06

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COOK COUNTY SHERIFF'S OFFICE

(Oficina del Aguacil del Condado de Cook)

INMATE GRIEVANCE RESPONSE / APPEAL FORM

(Petición de Queja del Preso/Respuesta/Forma de Apelación)

☒ GRIEVANCE ☐ NON-GRIEVANCE (REQUEST)

CONTROL #

2013X5325

INMATE INFORMATION

INMATE LAST NAME (Apellido del Preso):

Scott

INMATE FIRST NAME (Primer Nombre):

Quintin

ID Number (# de Identificación):

2013-0624121

GRIEVANCE / NON-GRIEVANCE (REQUEST) REFERRAL & RESPONSE

(EMERGENCY GRIEVANCES ARE THOSE INVOLVING AN IMMEDIATE THREAT TO THE WELFARE OR SAFETY OF AN INMATE)

CRW/PLATOON COUNSELOR'S SUMMARY OF THE COMPLAINT:

Dental Treatment

IMMEDIATE CRW/PLATOON COUNSELOR RESPONSE (if applicable):

CRW/PLATOON COUNSELOR REFERRED THIS GRIEVANCE/REQUEST TO (Example: Superintendent, Cermak Health Services, Personnel):

Cermak

DATE REFERRED:

11/21/13

RESPONSE BY PERSONNEL HANDLING REFERRAL:

Dental 12/13/13

PERSONNEL RESPONDING TO GRIEVANCE (Print):

[Signature]

SIGNATURE:

[Signature]

DIV./DEPT.

[Signature]

DATE:

12/2/13

Superintendents of a division/unit must review all responses to grievances alleging staff use of force, staff misconduct and emergency grievances.

SUPERINTENDENT/DIRECTOR/DESIGNEE (Print):

SIGNATURE:

[Signature]

DIV./DEPT.

[Signature]

DATE:

1/1/14

NON-GRIEVANCE (REQUEST) SUBJECT CODE (Check applicable box):

☐ GRIEVANCE SUBJECT CODE:☐ NON-GRIEVANCE SUBJECT CODE:

INMATE SIGNATURE (Firma del Preso):

[Signature]

DATE RESPONSE WAS RECEIVED:

12/12/13

INMATE'S REQUEST FOR AN APPEAL (Solicitud de Apelación del Preso)

- * To exhaust administrative remedies, appeals must be made within 14 days of the date the inmate received the response.
- * Las apelaciones tendrán que ser sometidas dentro del los 14 días; a partir que el preso recibió la respuesta para agotar todas las posibles respuestas administrativas.

DATE OF INMATE'S REQUEST FOR AN APPEAL: (Fecha de la solicitud de la apelación del detenido:) ____ / ____ / ____

INMATE'S BASIS FOR AN APPEAL: (Base del detenido para una apelación:)

ADMINISTRATOR/DESIGNEE'S ACCEPTANCE OF INMATE'S APPEAL?
(¿Apelación del detenido aceptada por el administrador o/su designado(a)?)

Yes (Si)

No

☐☐

ADMINISTRATOR/DESIGNEE'S DECISION OR RECOMMENDATION: (Decision o recomendación por parte del administrador o/su designado(a):)

ADMINISTRATOR/DESIGNEE (Administrador o/su Designado(a):)

SIGNATURE (Firma del Administrador o/su Designado(a):)

DATE (Fecha):

INMATE SIGNATURE (Firma del Preso):

DATE INMATE RECEIVED APPEAL RESPONSE
(Fecha en que el preso recibió respuesta a su apelación):Plaintiffs' Exhibit
ScottGrievances 06

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COOK COUNTY SHERIFF'S OFFICE

(Oficina del Alguacil del Condado de Cook)

INMATE GRIEVANCE FORM

(Formulario de Queja del Preso)

☒ GRIEVANCE ☐ NON-GRIEVANCE (REQUEST)

CONTROL #

2013X 5683 ✓

I This section is to be completed by Program Services staff - ONLY ! (! Para ser llenado solo por el personal de Program Services !)

GRIEVANCE FORM PROCESSED AS:

- ☐ EMERGENCY GRIEVANCE
☒ GRIEVANCE
☐ NON-GRIEVANCE (REQUEST)

Program Services Supervisor Approving Non-Grievance (Request) Signature

REFERRED TO:

- ☒ CERMAK HEALTH SERVICES
☐ SUPERINTENDENT: _____
☐ OTHER: _____

INMATE INFORMATION (Información del Preso)

PRINT - INMATE LAST NAME (Apellido del Preso): SCOTT	PRINT - FIRST NAME (Primer Nombre): Quintin	ID Number (# de identificación): 20130624121
DIVISION (División): DIV-11	LIVING UNIT (Unidad): BG-410	DATE (Fecha): 12/8/13

INMATE'S BRIEF SUMMARY OF THE COMPLAINT (Breve Resumen de los Hechos del Preso):

- * An inmate wishing to file a grievance is required to do so within 15 days of the event he/she is grieving.
- * Inmate Disciplinary Hearing Board decisions cannot be grieved or appealed through the use of an Inmate Grievance Request/Response/Appeal Form.
- * When a grievance issue is processed as a NON-GRIEVANCE (REQUEST), an inmate may re-submit the grievance issue after 15 days to obtain a "Control Number" if there has been no response to the request or the response is deemed unsatisfactory.

- * Un preso que desea llenar una queja, se le requiere que lo haga dentro de los 15 días después del incidente.
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- * Cuando una Queja se procesa como una QUEJAS NO (PETICION), un preso podría re-someter una Queja después de los 15 días para recibir un "Numero de Control", ya sea porque no hay una respuesta o porque la respuesta es insatisfactoria.

PLEASE INCLUDE: Date of Incident - Time of Incident - Specific Location of Incident
(Por Favor, Incluya: Fecha Del Incidente - Hora Del Incidente - Lugar Especifico Del Incidente)

This grievance is wrote on the same matter concerning my tooth ache, which has not been addressed. I was seen by a dentist in dispensary in Div-11 around 8-5-13 and was scheduled for oral surgery to get my wisdom tooth pulled. Here it is 12-8-2013, I have yet to see the oral surgery and the pain is getting to be unbearable. I am suffering!!! in pain and can't eat properly. I need this situation solved as soon as possible.

ACTION THAT YOU ARE REQUESTING (Acción que esta solicitado):

NAME OF STAFF OR INMATE(S) HAVING INFORMATION REGARDING THIS COMPLAINT:
(Nombre del personal o presos que tengan información:)

INMATE SIGNATURE (Firma del Preso):

SUPERINTENDENTS/DIRECTORS/DESIGNEES OF A DIVISION/UNIT MUST REVIEW AND SIGN ALL GRIEVANCES ALLEGING STAFF USE OF FORCE, STAFF MISCONDUCT, AND EMERGENCY GRIEVANCES. IF THE INMATE GRIEVANCE IS OF A SERIOUS NATURE, THE SUPERINTENDENT MUST INITIATE IMMEDIATE ACTION.

CRW/PLATOON COUNSELOR (Print):

SIGNATURE:

DATE CRW/PLATOON COUNSELOR RECEIVED:

SUPERINTENDENT/DIRECTOR/DESIGNEE (Print):

SIGNATURE:

DATE REVIEWED:

Plaintiffs' Exhibit
ScottGrievances 06

App, 30



COOK COUNTY SHERIFF'S OFFICE

(Oficina del Aguacil del Condado de Cook)

INMATE GRIEVANCE RESPONSE / APPEAL FORM

(Petición de Queja del Preso/Respuesta/Forma de Apelación)

☒ GRIEVANCE ☐ NON-GRIEVANCE (REQUEST)

CONTROL #

2013X5683

INMATE INFORMATION

INMATE LAST NAME (Apellido del Preso):

Scott

INMATE FIRST NAME (Primer Nombre):

Quintin

ID Number (# de Identificación):

2013-0624121

GRIEVANCE / NON-GRIEVANCE (REQUEST) REFERRAL & RESPONSE

(EMERGENCY GRIEVANCES ARE THOSE INVOLVING AN IMMEDIATE THREAT TO THE WELFARE OR SAFETY OF AN INMATE)

CRW/PLATOON COUNSELOR'S SUMMARY OF THE COMPLAINT:

Dental Treatment

IMMEDIATE CRW/PLATOON COUNSELOR RESPONSE (if applicable):

CRW/PLATOON COUNSELOR REFERRED THIS GRIEVANCE/REQUEST TO (Example: Superintendent, Cermak Health Services, Personnel):

Cermak

DATE REFERRED:

12/10/13

RESPONSE BY PERSONNEL HANDLING REFERRAL:

Dental appt + 12/13/13
 per Patient Scheduling, seen by Oral Surgery on 11/5/13
 follow-up appt scheduled

PERSONNEL RESPONDING TO GRIEVANCE (Print):

C. Smith

SIGNATURE:

C. Smith

DIV./DEPT.

CHS

DATE:

12/13/13

Superintendents of a division/unit must review all responses to grievances alleging staff use of force, staff misconduct and emergency grievances.

SUPERINTENDENT/DIRECTOR/DESIGNEE (Print):

SIGNATURE:

DIV./DEPT.

DATE:

1/1/13

NON-GRIEVANCE (REQUEST) SUBJECT CODE (Check applicable box):

☐ GRIEVANCE SUBJECT CODE: _____☐ NON-GRIEVANCE SUBJECT CODE: _____

INMATE SIGNATURE (Firma del Preso):

x [Signature]

DATE RESPONSE WAS RECEIVED:

(Fecha en que la respuesta fue recibida):

12/20/2013

INMATE'S REQUEST FOR AN APPEAL (Solicitud de Apelación del Preso)

- * To exhaust administrative remedies, appeals must be made within 14 days of the date the inmate received the response.
- * Las apelaciones tendrán que ser sometidas dentro del los 14 días; a partir que el preso recibió la respuesta para agotar todas las posibles respuestas administrativas.

DATE OF INMATE'S REQUEST FOR AN APPEAL: (Fecha de la solicitud de la apelación del detenido): ____ / ____ / ____

INMATE'S BASIS FOR AN APPEAL: (Base del detenido para una apelación):

ADMINISTRATOR/DESIGNEE'S ACCEPTANCE OF INMATE'S APPEAL?
(¿Apelación del detenido aceptada por el administrador o/su designado(a)?)

Yes (Si)

☐

No

☐

ADMINISTRATOR/DESIGNEE'S DECISION OR RECOMMENDATION: (Decisión o recomendación por parte del administrador o/su designado(a):)

ADMINISTRATOR/DESIGNEE (Administrador o/su Designado(a)):

SIGNATURE (Firma del Administrador o/su Designado(a)):

DATE (Fecha):

INMATE SIGNATURE (Firma del Preso):

DATE INMATE RECEIVED APPEAL RESPONSE
(Fecha en que el preso recibió respuesta a su apelación):

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KEYMON AMMONS,)	
)	
Plaintiff,)	
)	
vs.)	No. 18-cv-5271
)	
THOMAS DART, SHERIFF OF)	
COOK COUNTY, et al.,)	
)	
Defendants.)	

The deposition of JUANA MACIAS called for examination pursuant to the Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before EMILY TOMALA, CSR, a notary public within and for the County of Cook and State of Illinois, at 2650 South California, Chicago, Illinois, on the 19th day of July, 2019, at the hour of 11:00 o'clock a.m.

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1 APPEARANCES:

2 THOMAS G. MORRISSEY, LTD.

3 BY: MR. PATRICK W. MORRISSEY

10150 South Western Avenue

4 Chicago, Illinois 60643

(773) 233-7900

5 patrickmorrisey1920@gmail.com

6 Representing the Plaintiff;

7
8 JOHNSON & BELL

9 BY: MS. LISA M. MCELROY

33 West Monroe Street

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10 Chicago, Illinois 60603

(312) 372-0770

11 mcelroy1@jbltd.com

12 Representing the Defendants.

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	I N D E X	
WITNESS		EXAMINATION
JUANA MACIAS		
By Mr. Morrissey:		4-69
By Ms. McElroy:		69-95
By Mr. Morrissey:		95-119
By Ms. McElroy:		119-120

	E X H I B I T S	
NUMBER		MARKED FOR ID
Deposition Exhibit		
No. 1		42
No. 2		44
No. 3		59
No. 4		97

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(Whereupon, the witness was duly sworn.)

MR. MORRISSEY: This is a deposition in Ammons vs. Dart taken pursuant to notice continued to this day. We're at the administration building at 26th and California at the request of county.

My name is Pat Morrissey. I'm going to ask you a series of questions. In the event you don't understand a question, please ask me to rephrase it. Do you understand?

THE WITNESS: Yes.

JUANA MACIAS,
having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. MORRISSEY:

Q. Please state your name.

A. Juana Macias.

Q. How do you spell your last name?

A. M-A-C-I-A-S.

Q. Where do you work?

A. Stroger Cook County Hospital Referral Support Center.

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1 Q. What is your title?

2 A. Clerk.

3 Q. How long have you held that position?

4 A. 29 years.

5 Q. Where is your office?

6 A. On 1900 West Polk.

7 Q. What floor?

8 A. First floor.

9 Q. How long has that been your office?

10 A. Maybe 3 years.

11 Q. Before holding an office at 1900 West
12 Polk, first floor, where did you office?

13 A. It was on the eighth floor, same
14 address.

15 Q. Approximately how long did you have an
16 office on the eighth floor of 1900 West Polk?

17 A. Maybe 6 years.

18 Q. Have you ever testified at a deposition
19 before?

20 A. No.

21 Q. Where did you attend high school?

22 A. Chicago.

23 Q. What school?

24 A. Lincoln Park.

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1 Q. Did you graduate?

2 A. Yes.

3 Q. After high school, did you attend any
4 other formal education?

5 A. I went to Catherine College, some
6 business courses.

7 Q. I didn't hear you. What college?

8 A. Catherine College.

9 Q. Where is Catherine College?

10 A. Downtown Chicago.

11 Q. When did you attend Catherine College?

12 A. '87.

13 Q. How many hours of schoolwork did you
14 complete?

15 A. It was a couple months.

16 Q. What year did you start working for the
17 county?

18 A. 1990.

19 Q. What are your responsibilities now as a
20 clerk for the county health system?

21 A. Repeat that. I'm sorry.

22 Q. What are your responsibilities now as a
23 clerk for the county health system?

24 A. I do the scheduling for some of the

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1 **specialty clinics for Stroger Hospital,**
2 **Provident, and Oak Forest.**

3 Q. Stroger, Provident, and Oak Forest?

4 **A. Yes.**

5 Q. Which specialty clinics now do you
6 schedule for?

7 **A. I do oral surgery, musculoskeletal,**
8 **ENT, geriatrics.**

9 Q. How long have you been scheduling those
10 specialty clinics for?

11 **A. A couple years.**

12 Q. Do you work with other clerks to
13 schedule patients for those specialty clinics?

14 **A. Yes.**

15 Q. What other clerks do you work with?

16 **A. It's 4 other people.**

17 Q. What are their names?

18 **A. Alpedia Valez (phonetic), Gloria**
19 **Guittierez, Marla Griffith, and we have Bharat,**
20 **B-H-A-R-A-T. I can't remember his last name.**

21 Q. Before working as a clerk scheduling
22 patients for the specialty clinics you
23 described, what did you do as a clerk?

24 **A. I always have done scheduling.**

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1 Q. What other specialty clinics have you
2 scheduled for?

3 **A. I already named them earlier.**

4 Q. You mentioned you schedule for oral
5 surgery -- Strike that.

6 You mentioned a few clinics that you
7 scheduled for the last few years, correct?

8 **A. Correct.**

9 Q. Have you always scheduled for oral
10 surgery?

11 **A. For a couple years.**

12 Q. When did you start scheduling for oral
13 surgery?

14 **A. I don't have a definite date, probably**
15 **3, 4 years.**

16 Q. How long have you been scheduling for
17 ENT?

18 **A. Maybe 10 years.**

19 Q. How long have you been scheduling for
20 geriatrics?

21 **A. 3, 4 years.**

22 Q. You also testified you schedule for
23 musculoskeletal. How long have you been doing
24 that for?

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1 **A. Probably a couple months. It was just**
2 **assigned to me.**

3 Q. In your 29 years as a clerk scheduling
4 patients, what other clinics have you scheduled
5 people for?

6 **A. Primary care.**

7 Q. Any others?

8 **A. I can't remember.**

9 Q. Who is your supervisor?

10 **A. Shavon Tannan, T-A-N-N-A-N.**

11 Q. How long has Ms. Tannan been your
12 supervisor?

13 **A. 4 to 5 years.**

14 Q. Do you know what her position is with
15 the county health system?

16 **A. She's a manager.**

17 Q. Do you know if she has a manager?

18 **A. John Pendergast (phonetic).**

19 Q. Do you know what Mr. Pendergast's title
20 is?

21 **A. I do not know his title.**

22 Q. Does he supervise you?

23 **A. He has in the past.**

24 Q. What documents did you review prior to

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1 coming here today to testify?

2 **A. What Ms. Lisa McElroy showed me, the**
3 **printout of the Cerner -- the scheduling for the**
4 **detainee.**

5 Q. How many pages was the document?

6 **A. Maybe 4, 5. I don't recall.**

7 Q. Other than looking at a scheduling
8 document that was perhaps 4 to 5 pages, did you
9 review any other documents prior to coming here
10 today to testify?

11 **A. No.**

12 Q. Do you schedule patients at the Cook
13 County Jail for specialty clinics?

14 **A. Only for oral surgery.**

15 Q. How long have you scheduled patients
16 that are detained at the Cook County Jail for
17 oral surgery for?

18 **A. Probably 4 years.**

19 Q. Are you familiar with how to schedule a
20 patient detained at the Cook County Jail for
21 oral surgery?

22 **A. Yes.**

23 Q. Who trained you about how to do that?

24 **A. Shavon Tannan.**

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1 Q. When did she provide the training?

2 A. 4 years ago.

3 Q. After the training 4 years ago, have
4 you received any follow-up training about how to
5 schedule patients detained at the Cook County
6 Jail for oral surgery?

7 A. No.

8 Q. When you were trained by Ms. Tannan
9 about how to schedule patients for oral surgery
10 at the jail, were you given any documents?

11 A. No.

12 Q. Tell me about what you remember from
13 the training by Ms. Tannan.

14 A. I go in the orders in the Cerner
15 scheduling, and I have my first detainee or
16 patient, and I process the appointment. The
17 system gives me the next available date, and I
18 okay, confirm, and it's done.

19 Q. How long was this training by
20 Ms. Tannan?

21 A. I don't remember.

22 Q. Is there anything that could refresh
23 your memory about how long you were trained by
24 your supervisor --

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1 **A. How long it took?**

2 Q. How long this training session was?

3 **A. No more than an hour.**

4 Q. Where is oral surgery performed?

5 **A. At Stroger, first floor, Clinic D.**

6 Q. As an employee of the county health
7 system for about 29 years, has there ever been
8 any other location where oral surgery is
9 performed?

10 MS. MCELROY: Objection, foundation.

11 You can answer.

12 BY THE WITNESS:

13 **A. It was in the Fantus building that does**
14 **not exist anymore. It was right next to the old**
15 **hospital.**

16 BY MR. MORRISSEY:

17 Q. Do you remember when oral surgery was
18 conducted in the Fantus building?

19 **A. I don't.**

20 Q. To your knowledge, is oral surgery
21 performed at any other hospital in the county
22 health system?

23 **A. Not that I know of.**

24 Q. Do you know whether there was ever an

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1 oral surgeon at the Cook County Jail campus?

2 **A. I don't know that.**

3 Q. Do you know whether there are specialty
4 clinics at the Cook County Jail campus?

5 **A. I don't know that.**

6 Q. Other than oral surgery appointments
7 for detainees, is there any other medical
8 appointment that you schedule for detainees at
9 the Cook County Jail?

10 **A. No.**

11 Q. Why to your knowledge did you start
12 scheduling detainees for oral surgery?

13 **A. I'm sorry?**

14 Q. Why to your knowledge did you begin
15 scheduling detainees for oral surgery about 4
16 years ago?

17 **A. I was assigned by my supervisor.**

18 Q. Do you know how they were scheduled
19 before you assumed that responsibility?

20 MS. MCELROY: Objection, foundation.

21 You can answer if you know.

22 THE WITNESS: I can answer?

23 MS. MCELROY: Yes, if you know.
24

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1 BY THE WITNESS:

2 A. It was an IRIS system. We used to
3 schedule them in Cerner, and when it was
4 completed, it was faxed back to Cermak with the
5 appointment date.

6 BY MR. MORRISSEY:

7 Q. How do you know that?

8 A. I was doing it, so that's how I
9 remember.

10 Q. When did you stop using the IRIS
11 system?

12 A. 3, 4 years ago.

13 Q. In the year 2017, was IRIS used to your
14 knowledge?

15 A. I don't remember.

16 Q. How is the IRIS system different from
17 the present system for scheduling patients for
18 oral surgery who are detained at the Cook County
19 Jail?

20 A. The referrals were entered into that
21 system, and we used to print the referrals that
22 were requested daily Monday through Friday.

23 Q. Presently do you ever print the daily
24 schedule?

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1 **A. Yes.**

2 Q. When do you print the daily schedule?

3 **A. Presently?**

4 Q. Correct.

5 **A. We don't print them. They're in the**
6 **Cerner system.**

7 Q. Do you know whether anybody else in
8 your office schedules detainees at the Cook
9 County Jail for oral surgery?

10 **A. I don't know.**

11 Q. When you were trained on scheduling
12 detainees for oral surgery, was anybody else
13 present besides your supervisor?

14 **A. No.**

15 Q. Do you schedule people who are not
16 detained at the Cook County Jail for oral
17 surgery?

18 **A. Yes.**

19 Q. How do you schedule a person who is not
20 detained at the Cook County Jail for oral
21 surgery?

22 **A. Orders are requested in Cerner as well,**
23 **and we get a lot of patients that call us.**

24 Q. So if a person is not in the Cook

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1 County Jail, you could either schedule based on
2 the order requested in Cerner or a call by a
3 patient?

4 **A. Yes.**

5 Q. If a patient is detained at the Cook
6 County Jail, the only way that you would
7 schedule the patient for oral surgery is if
8 there's an order entered in Cerner?

9 **A. Correct.**

10 Q. Do you know whether any other clerk you
11 work with schedules patients for oral surgery
12 who are not in the Cook County Jail?

13 **A. Yes.**

14 Q. Who else schedules those?

15 **A. Alpedia Valez, Gloria Guittierez,**
16 **that's it.**

17 Q. So to your knowledge, there are 3
18 clerks in your office that can schedule patients
19 for oral surgery who are free?

20 **A. Yes.**

21 Q. When is oral surgery performed at
22 Stroger?

23 MS. MCELROY: Objection, foundation.

24 You can answer if you know.

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1 BY THE WITNESS:

2 **A. I don't know.**

3 BY MR. MORRISSEY:

4 Q. How many oral surgery appointments can
5 you schedule a week?

6 **A. It varies. It could be from 10 to 15**
7 **for detainees.**

8 Q. How many total oral surgery
9 appointments can you schedule a week?

10 **A. Is that for inmates?**

11 Q. For everybody.

12 **A. I don't have a count.**

13 Q. Do you have any knowledge how many
14 people can be scheduled for oral surgery on a
15 given day?

16 **A. Probably 10 to 15.**

17 Q. How do you know the number of
18 appointment slots available for oral surgery on
19 a given day?

20 **A. The system gives it to me.**

21 Q. When you schedule a patient for oral
22 surgery, is there a time frame or a duration
23 that you would schedule the patient to see the
24 oral surgeon?

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1 **A. It's a few slots, and the time --**

2 MS. MCELROY: Do you understand the
3 question?

4 MR. MORRISSEY: I think she's answering
5 the question.

6 MS. MCELROY: I'm making sure.

7 THE WITNESS: Can you repeat the
8 question?

9 BY MR. MORRISSEY:

10 Q. Sure. Presently how many oral surgeons
11 work at Stroger to your knowledge?

12 **A. I don't know.**

13 Q. How do you know -- Strike that.

14 What types of information can you see
15 on an order that a patient should be referred to
16 an oral surgeon?

17 **A. The diagnosis.**

18 Q. Anything else?

19 **A. The person that requested that order.**

20 Q. Anything else?

21 **A. The date that it was requested.**

22 Q. Anything else?

23 **A. I can't think of anything else.**

24 Q. What diagnoses have you seen on an

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1 order entered in Cerner referring a patient to
2 oral surgery?

3 **A. Impacted teeth, cavity, I can't think**
4 **of anything else.**

5 Q. When you receive a referral order for a
6 patient to be seen by oral surgery, is there
7 generally a diagnosis on that referral?

8 **A. Yes.**

9 Q. Have you ever seen a diagnosis of an
10 abscess?

11 **A. I have seen a diagnosis.**

12 Q. What do you call that information that
13 we just discussed?

14 **A. Diagnosis.**

15 Q. You mentioned earlier that the referral
16 order by a provider to see an oral surgeon would
17 have this type of information?

18 **A. Yes.**

19 Q. How do you access that referral order?

20 **A. It's right next to the patient's name,**
21 **so that's how I will be able to see it, and the**
22 **date that it was requested.**

23 Q. Have you seen any referral orders for
24 Keymon Ammons to be seen by the oral surgeon?

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1 **A. I don't remember.**

2 Q. Prior to coming here today to testify,
3 did you look at any referral orders for Keymon
4 Ammons to see the oral surgeon?

5 **A. No.**

6 Q. What do you do when you review a
7 referral order -- Strike that.

8 How do you prioritize a patient to be
9 seen by the oral surgeon based on a referral
10 order in Cerner?

11 **A. I schedule detainees in the order that**
12 **they were received, and the system gives me the**
13 **next available date.**

14 Q. To your knowledge, is there any doctor
15 who supervises your scheduling of patients for
16 oral surgery?

17 **A. I know Dr. Qaisi is over the clinic.**
18 **That's all I know.**

19 Q. Have you ever talked to doctor --
20 Strike that.

21 What is Dr. Qaisi's title?

22 **A. He's an oral surgeon.**

23 Q. How do you spell his last name?

24 **A. It's Q-A-I-S-I.**

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1 Q. Did Dr. Qaisi ever give you any
2 instructions about how to prioritize patients
3 for oral surgery?

4 A. No.

5 Q. Do you consider the diagnosis on the
6 Cerner referral order for oral surgery when you
7 schedule the patient?

8 MS. MCELROY: Objection, foundation.

9 You can answer.

10 BY THE WITNESS:

11 A. I still schedule the detainee for the
12 next available date.

13 BY MR. MORRISSEY:

14 Q. The question is, do you factor in a
15 diagnosis by the medical provider who entered
16 the referral for the patient to see an oral
17 surgeon?

18 MS. MCELROY: Same objection.

19 BY THE WITNESS:

20 A. No.

21 BY MR. MORRISSEY:

22 Q. When you schedule a patient for oral
23 surgery based on a referral in Cerner, do you
24 make any notes about your efforts to schedule

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1 the patient?

2 **A. No.**

3 Q. Have you ever seen a referral order for
4 a patient to see an oral surgeon indicating the
5 patient is in pain?

6 **A. I see that a lot in the orders for**
7 **detainees and for general public.**

8 Q. Where would you identify that
9 information in the referral order?

10 **A. It's in the diagnosis.**

11 Q. What do you mean you see that a lot?

12 **A. It's in the diagnosis with the**
13 **comments.**

14 Q. So on a regular basis, there's a
15 comment about the patient's level of pain in the
16 referral order; is that fair to say?

17 **A. In a few orders.**

18 Q. In the referral orders, do you ever see
19 any notation about which teeth the medical
20 provider referred the patient to oral surgery
21 for?

22 **A. Yes.**

23 Q. Where do you see that information?

24 **A. In the diagnosis, in the comments.**

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1 Q. You mentioned comments?

2 A. Uh-huh.

3 Q. Is that a yes?

4 A. Yes.

5 Q. Where is the comments section?

6 A. It's right next to the diagnosis.

7 Q. In the scheduling records you reviewed
8 prior to coming here today to testify, did you
9 see any comments for Keymon Ammons?

10 A. No.

11 Q. Did you see any diagnoses for Keymon
12 Ammons?

13 A. No.

14 Q. The referral order for oral surgery
15 from a dentist at the Cook County Jail, does it
16 normally have a diagnosis?

17 A. Yes.

18 Q. In the referral orders for patients who
19 are detained at the Cook County Jail to see an
20 oral surgeon, are there usually comments?

21 A. Yes.

22 MR. MORRISSEY: Counsel, I don't
23 believe this has been produced.

24 MS. MCELROY: We produced records last

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1 night.

2 MR. MORRISSEY: Yes, but there wasn't
3 any diagnosis in the records produced last
4 night.

5 MS. MCELROY: We can address this off
6 the record after the deposition.

7 MR. MORRISSEY: You represented that
8 the stuff that was given to me last night
9 was scheduling records, and this witness
10 says that there's normally diagnoses and
11 comments. The information I was given
12 yesterday doesn't have that.

13 MS. MCELROY: We can address this after
14 the deposition.

15 BY MR. MORRISSEY:

16 Q. How do you schedule -- Strike that.

17 You mentioned you schedule patients who
18 call in to your office for oral surgery?

19 A. Yes.

20 Q. How do you do that?

21 A. I ask the patient if they have
22 insurance, what is the diagnosis. I let them
23 know that we do have a couple of months wait for
24 an appointment, and then if they accept it, I

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1 **schedule the appointment.**

2 Q. For a patient to call in for an
3 appointment with the oral surgeon, does he or
4 she have to have a referral by a medical
5 provider?

6 **A. Yes, by a regular dentist.**

7 Q. What do you mean by a regular dentist?

8 **A. They've been referred to us for oral**
9 **surgery, so they specialize in oral surgery.**

10 Q. If a patient calls you on the phone
11 requesting an oral surgery appointment, does the
12 patient have to have a documented diagnosis from
13 a dentist for you to schedule the patient for
14 oral surgery?

15 **A. Yes.**

16 Q. Do you have to see the referral form
17 before you schedule the patient for oral
18 surgery?

19 **A. I don't have to see it. They can bring**
20 **it in when they come in.**

21 Q. Come in where?

22 **A. To the clinic.**

23 Q. Do you work in the oral surgery clinic?

24 **A. No.**

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1 Q. You mentioned you let people know on
2 the phone that there's a few month wait; is that
3 fair to say?

4 A. **That's when they're letting me know**
5 **that they're in a lot of pain, so I give them**
6 **what we have.**

7 Q. If somebody's in a lot of pain and
8 calls you on the phone, do you ever refer them
9 to other locations?

10 A. **They also have an option of calling the**
11 **dental line. It's open Monday through Friday,**
12 **and they take calls at 8:00 o'clock in the**
13 **morning, and it's for the next business day.**
14 **They have that option. I always let them know.**

15 Q. What do you mean it's for the next
16 business day?

17 A. **They're scheduled for the next business**
18 **day for a consultation.**

19 Q. By an oral surgeon?

20 A. **Yes, but that's not done by us.**

21 Q. Do you know whether detainees at the
22 Cook County Jail with a referral order to see
23 the oral surgeon have the option to reach out to
24 the dental line for a next-day consultation?

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1 **A. I don't know that.**

2 Q. Presently how long -- Strike that.

3 Presently what is the next available
4 appointment to see the oral surgeon at Stroger?

5 **A. For general public, it's for the month**
6 **of November.**

7 Q. What do you mean the general public?

8 **A. A patient that's not a detainee.**

9 Q. What is the next available appointment
10 for a patient at the Cook County Jail?

11 **A. October.**

12 Q. How do you know that?

13 **A. I know that because I just seen that**
14 **yesterday.**

15 Q. So any inmate presently who has a
16 referral by a dentist to see an oral surgeon,
17 the next date he or she can get in to see the
18 oral surgeon is in October?

19 **A. Yes.**

20 Q. And based on your knowledge, there's no
21 way that you could advance the date for a
22 patient to see the oral surgeon?

23 **A. Not me.**

24 Q. Who can?

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1 **A. I don't know.**

2 Q. Which date in October is the next
3 available appointment?

4 **A. Around the first week of October.**

5 Q. How many people can be scheduled to see
6 the oral surgeon on a daily basis who are in the
7 Cook County Jail?

8 **A. Daily basis?**

9 Q. What is the most number of patients you
10 have seen scheduled to see the oral surgeon from
11 the Cook County Jail?

12 **A. 10 to 15 slots per week.**

13 Q. How about on a daily basis?

14 **A. It varies. It could be up to 10**
15 **patients.**

16 Q. Have you ever seen 10 patients
17 scheduled from the Cook County Jail to see an
18 oral surgeon on one specific day?

19 **A. I don't have a number.**

20 Q. Is it fair to say you have no knowledge
21 about how many -- the maximum number of patients
22 from the Cook County Jail who have been seen by
23 an oral surgeon on a specific day?

24 **A. It's 10 to 15 slots a week.**

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1 Q. My question is per day. Do you have
2 any knowledge about the maximum number of
3 patients seen by the oral surgeon on a specific
4 day?

5 A. No.

6 Q. Assuming you schedule a person who is
7 in the Cook County Jail for an oral surgery
8 appointment on October 1st, 2018 -- do you
9 follow me -- and the computer system accepts
10 that appointment date; do you follow me?

11 A. I'm sorry?

12 Q. Yesterday did you schedule a person
13 from the Cook County Jail to see an oral
14 surgeon?

15 A. Yes.

16 MS. MCELROY: Objection, form,
17 foundation.

18 BY MR. MORRISSEY:

19 Q. And you mentioned that date was early
20 October of 2019?

21 A. Correct.

22 Q. Is there anything else you have to do
23 as a clerk for the county health system to
24 facilitate that patient at the Cook County Jail

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1 to be transferred over for the oral surgery
2 appointment?

3 **A. I do the scheduling. That's it.**

4 Q. What do you consider the scheduling?

5 MS. MCELROY: Objection, asked and
6 answered. She's already taken you through
7 the scheduling process. You can answer.

8 BY THE WITNESS:

9 **A. I schedule, confirm the appointment in**
10 **the Cerner system.**

11 BY MR. MORRISSEY:

12 Q. So the patient from the Cook County
13 Jail you scheduled yesterday, you completed the
14 scheduling process for that patient, correct?

15 **A. Yes.**

16 Q. And the patient has a confirmed
17 appointment sometime early October?

18 **A. Correct.**

19 Q. Before that patient actually is seen by
20 the oral surgeon, do you have to do anything
21 else as a clerk assigned to schedule patients
22 for that patient to be brought over to Stroger
23 for the appointment?

24 **A. I don't have to do nothing else.**

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1 Q. Do you know how patients detained at
2 the Cook County Jail are transported over to
3 Stroger for appointments in specialty clinics?

4 MS. MCELROY: Objection, foundation.
5 You can answer if you know.

6 MR. MORRISSEY: I'm asking whether she
7 knows.

8 BY THE WITNESS:

9 **A. I don't know.**

10 BY MR. MORRISSEY:

11 Q. Do you know whether there's a limit on
12 the number of patients from the Cook County Jail
13 that can be transported over to a Stroger
14 specialty clinic on a certain day?

15 MS. MCELROY: Objection, form,
16 foundation. She's not a sheriff's employee.
17 You can answer if you know.

18 MR. MORRISSEY: I don't see how being a
19 sheriff's employee -- I asked her about her
20 knowledge.

21 BY THE WITNESS:

22 **A. I don't know that information.**
23
24

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1 BY MR. MORRISSEY:

2 Q. Have you ever been told that there is a
3 limit on the number of patients that can be
4 scheduled from the Cook County Jail to a Stroger
5 specialty clinic?

6 A. No.

7 Q. Do you have any knowledge where
8 patients are held who are detained at the Cook
9 County Jail for a Stroger oral surgery
10 appointment?

11 A. No.

12 Q. Have you ever seen a referral for a
13 patient to have wisdom teeth removed?

14 A. For a detainee?

15 Q. For any kind of patient.

16 A. Can you repeat that?

17 Q. Have you ever seen a referral for a
18 patient to be scheduled for oral surgery to have
19 wisdom teeth removed?

20 A. In the orders.

21 Q. Has that happened more than once?

22 A. Yes.

23 Q. Is that a common occurrence that a
24 patient has a referral for extraction of wisdom

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1 teeth?

2 **A. Yes.**

3 Q. Have you ever seen a patient with a
4 referral for all 4 wisdom teeth to be removed?

5 **A. Yes.**

6 Q. Have you ever scheduled a patient for a
7 referral to see the oral surgeon for extraction
8 of 4 wisdom teeth?

9 **A. Yes.**

10 Q. What would you do -- Strike that.
11 How would you schedule a person who has
12 an order in Cerner for 4 wisdom teeth to be
13 removed?

14 **A. I schedule the first appointment in**
15 **Cerner.**

16 Q. Is there a way for you to document why
17 you scheduled that patient for evaluation by the
18 oral surgeon?

19 **A. I don't have to make any comments.**

20 Q. Why not?

21 **A. Because there is a diagnosis. There is**
22 **an order. So I don't have to make any comments.**

23 Q. So the referral order would explain the
24 diagnosis, correct?

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1 **A. Correct.**

2 Q. Have you ever scheduled a patient for
3 oral surgery who has no referral diagnosis?

4 **A. No.**

5 Q. Why not?

6 **A. Because it has to be requested. It has**
7 **to be entered into the order.**

8 Q. So every person you schedule for an
9 oral surgery appointment has had a diagnosis?

10 **A. Yes.**

11 Q. Now, you mentioned a referral order by
12 a dentist has a diagnosis?

13 **A. Yes.**

14 Q. You also mentioned that it may have
15 comments?

16 **A. Sometimes there are comments.**

17 Q. Where would the comments be located on
18 the referral order to your knowledge?

19 **A. Right next to the diagnosis.**

20 Q. Is that a separate box, the comment
21 box?

22 **A. Yes.**

23 Q. Other than the diagnosis, the person
24 requesting the referral, and the date the

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1 referral was requested, to your knowledge, is
2 there anything else that would be found on a
3 referral order by a dentist?

4 **A. No.**

5 Q. At times, do patients who are seen by
6 the oral surgeon have to come back to the
7 clinic?

8 **A. They're not scheduled by me or any of**
9 **my coworkers. If they have to come back,**
10 **they're done by the clinical staff.**

11 Q. Do you know any of the clinical staff
12 in the Stroger oral surgery department?

13 **A. Do I know them?**

14 Q. Do you know their names?

15 MS. MCELROY: Answer if you know.

16 BY THE WITNESS:

17 **A. I know one.**

18 BY MR. MORRISSEY:

19 Q. Who is it?

20 **A. I believe her name is Elizabeth Rivera.**

21 Q. How do you know Ms. Rivera?

22 **A. And there's another person that works**
23 **there, Bacilia Solice (phonetic). They have**
24 **around the same seniority as me.**

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1 Q. Do you have access to a patient's
2 Cerner records?

3 A. Yes.

4 Q. Is the referral order that you have
5 been discussing for oral surgery found in the
6 Cerner records?

7 A. It should be.

8 Q. Where else to your knowledge could it
9 be located?

10 A. Power Chart.

11 Q. To your knowledge, is Power Chart
12 different from Cerner?

13 A. It's in Cerner.

14 Q. Have you ever heard of a program called
15 Dentrrix?

16 A. No.

17 Q. As a clerk, how do you know or how are
18 you alerted that a patient has a referral to see
19 the oral surgeon?

20 A. Is this for an inmate or general
21 public?

22 Q. Let's start with general public.

23 A. Some referrals are requested in the
24 orders, and some are being faxed to us. That's

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1 from clinics that are affiliated with Cook
2 County.

3 Q. If a referral is entered -- Strike
4 that.

5 You mentioned if it's the general
6 public, it may be in an order?

7 A. If it's general public, they are
8 requested in the order in Cerner from Cook
9 County clinics like Logan Square. And if
10 they're from clinics that are affiliated with
11 the hospital, they are being faxed to us.

12 Q. How are you notified that a member of
13 the general public has an order in Cerner to see
14 the oral surgeon?

15 A. We can see them in the orders.

16 Q. Is there a queue that those orders --

17 A. There's a queue with the patient's name
18 and medical record number. We look it up.

19 Q. So would you agree that if a member of
20 the general public has an order in Cerner for
21 evaluation by the oral surgeon, his or her name
22 would pop up in the queue?

23 A. Yes.

24 Q. And you monitor the queue for the

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1 general public?

2 **A. Yes.**

3 Q. Does anybody else monitor that queue to
4 your knowledge for the general public?

5 **A. All my coworkers have access to that.**

6 Q. For a patient in the Cook County Jail,
7 how would you be notified that a patient has a
8 referral to see the oral surgeon?

9 **A. I only see the oral surgery referrals**
10 **for inmates.**

11 Q. How would you receive notice that a
12 patient at the jail has an oral surgery
13 referral?

14 **A. They're in my orders. In the**
15 **appointment type, it tells me that it's an**
16 **inmate. Right next to it, it says Cermak.**

17 Q. Is this the same location on your
18 computer that you find the orders in Cerner for
19 the general public?

20 **A. It's in the same, yes.**

21 Q. Are the orders for -- Strike that.

22 Are the orders in Cerner for the
23 general public to see an oral surgeon in the
24 same queue as the orders for patients in the

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1 Cook County Jail to see the oral surgeon?

2 **A. It's in the same queue.**

3 Q. When is the last time you scheduled a
4 patient in the general public to see the oral
5 surgeon?

6 **A. Yesterday.**

7 Q. You mentioned the earliest day is in
8 the month of November?

9 **A. Yes.**

10 Q. What part of the month of November?

11 **A. The first week.**

12 Q. Why to your knowledge is there a
13 difference for the first available appointment
14 for a patient in the Cook County Jail compared
15 to the general public?

16 **A. That's what the system gives me.**

17 Q. Does the first available date
18 fluctuate?

19 **A. It's 10 to 12 weeks.**

20 Q. For the general public?

21 **A. For the general public, it could be a**
22 **little bit more.**

23 Q. Why would the general public to your
24 knowledge have to wait longer for an oral

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1 surgery appointment?

2 MS. MCELROY: Objection, form,
3 foundation. You can answer if you know.
4 BY THE WITNESS:

5 **A. I don't know.**

6 BY MR. MORRISSEY:

7 Q. Have you ever seen the wait time for
8 the general public to be less than inmates at
9 the Cook County Jail?

10 **A. I don't remember that.**

11 Q. In the year 2018, do you know whether
12 the wait time for inmates at the Cook County
13 Jail was longer or shorter than the general
14 public?

15 **A. It's been the same.**

16 Q. The same wait time?

17 **A. The same wait time, 10 to 12 weeks.**

18 Q. If a patient is scheduled for an oral
19 surgery appointment, do you have any knowledge
20 whether that patient is ever brought over from
21 the Cook County Jail?

22 MS. MCELROY: Objection, form,
23 foundation.
24

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1 BY THE WITNESS:

2 **A. I don't know.**

3 BY MR. MORRISSEY:

4 Q. Do you ever cancel appointments for
5 oral surgery?

6 **A. For general public, yes.**

7 Q. Describe how that procedure works for
8 the general public.

9 **A. That's if I get a patient that calls me**
10 **and wants to cancel that appointment.**

11 Q. How do you cancel the appointment?

12 **A. I go in Cerner. I get the patient's**
13 **information. I see the appointment, and I**
14 **choose cancel request by patient.**

15 Q. Have you ever canceled an appointment
16 for an inmate at the Cook County Jail?

17 **A. No.**

18 Q. Do you know whether there's a procedure
19 for an inmate at the Cook County Jail to cancel
20 an oral surgery appointment?

21 **A. No.**

22 Q. Do you know any of the dentists at the
23 Cook County Jail?

24 **A. No.**

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1 Q. Have you ever seen the names of any of
2 the Cook County Jail dentists on a referral?

3 A. I have seen names, but I never -- I
4 can't tell you what their names are.

5 Q. Do you know a woman by the name of
6 Dr. Jorelle Alexander?

7 A. No.

8 MR. MORRISSEY: I'm going to mark a
9 document called schedule histories as
10 Exhibit 1.

11 (Whereupon, Deposition Exhibit
12 No. 1 was marked for
13 identification.)

14 BY MR. MORRISSEY:

15 Q. I'm showing you what's Exhibit 1
16 entitled schedule histories. Do you see that?

17 A. I'm sorry. I cannot read this.

18 Q. I'll show you an electronic copy of
19 Exhibit 1. Do you see that page on my computer?

20 A. Yes, I do.

21 Q. Do you recognize that box?

22 A. Yes.

23 Q. What is that box?

24 A. I confirmed it April 9. I scheduled

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1 **that appointment.**

2 Q. I'll ask you a preliminary question.
3 Do you have access to this type of information
4 in your computer?

5 **A. Yes.**

6 Q. How do you access this type of
7 information?

8 **A. How? It's in the Cerner system.**

9 Q. So you see your name next to 4/9/2018?

10 **A. Yes, I see that.**

11 Q. From looking at that record, your name
12 is next to confirmed and booked?

13 **A. Yes.**

14 Q. What does that mean to you?

15 **A. I booked it. I confirmed it April 9.**

16 Q. From looking at this document, is there
17 a way for you to access this person's diagnosis?

18 **A. It should be on the order.**

19 Q. Is there a tab for order?

20 **A. Yes.**

21 Q. And you always have an order when you
22 schedule somebody for oral surgery?

23 **A. Yes.**

24 Q. From looking at this document, can you

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1 identify why this person was scheduled by you
2 for a specialty clinic?

3 **A. If you go in the order, you will be**
4 **able to see that diagnosis.**

5 Q. But from looking at the document that's
6 in front of you, you're unable to testify about
7 why you scheduled this patient for --

8 **A. I don't know why.**

9 MR. MORRISSEY: I'm going to mark some
10 pages that were produced yesterday that are
11 Bates stamped 1503 to 1512 as Exhibit 2.

12 (Whereupon, Deposition

13 Exhibit No. 2 was marked for
14 identification.)

15 BY MR. MORRISSEY:

16 Q. Ma'am, I'm showing you what was
17 produced yesterday by your attorney. I want to
18 look at page 1503. Do you see that?

19 **A. Yes.**

20 Q. Did you review this one page prior to
21 coming here today to testify?

22 MS. MCELROY: Answer if you remember.

23 BY THE WITNESS:

24 **A. I have never seen this.**

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1 BY MR. MORRISSEY:

2 Q. What about the next page, page 1504?

3 A. **It's the same information in the**
4 **computer.**

5 Q. Have you ever seen this page before?

6 A. **That (indicating)? Yes.**

7 Q. You're pointing to my computer,
8 correct?

9 A. **Yes.**

10 Q. Have you ever seen page 1504 before?

11 A. **Yes.**

12 Q. When you refer somebody for oral
13 surgery, does the dentist in the referral order
14 identify which teeth the patient is referred
15 for?

16 MS. MCELROY: Objection, form,
17 foundation. She doesn't refer anybody.

18 MR. MORRISSEY: That's not what I asked
19 her.

20 MS. MCELROY: That was what you asked
21 her. You said when you refer a patient.

22 MR. MORRISSEY: Then I'll rephrase it.
23
24

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1 BY MR. MORRISSEY:

2 Q. Ma'am, when a dentist enters a referral
3 order for a patient to be seen by the oral
4 surgeon, is there generally a notation about
5 what teeth are being referred?

6 A. Yes.

7 Q. Based on your knowledge, how can that
8 information be conveyed to you?

9 A. I honestly do not need that
10 information. It would be the doctor that would
11 see that patient in the clinic.

12 Q. To your knowledge, are teeth referred
13 to by numbers?

14 A. Yes.

15 Q. Is it common when you review referral
16 orders by dentists that there would be an
17 indication of what tooth number the patient is
18 being referred for?

19 A. Yes.

20 Q. Are almost all the referral orders that
21 you receive for oral surgery, they normally all
22 have tooth numbers on them?

23 A. Most of them.

24 Q. When you schedule a patient to be seen

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1 by the oral surgeon, how long do you schedule
2 that patient to be seen?

3 **A. What do you mean how long?**

4 Q. I'm talking about the time. Is there a
5 standard appointment time that you normally
6 schedule a patient to be seen by the oral
7 surgeon?

8 **A. It's 10 to 12 weeks.**

9 Q. I'm asking about the time for the
10 patient to be seen by the oral surgeon?

11 MS. MCELROY: Objection, form,
12 foundation. You can answer if you know.
13 BY THE WITNESS:

14 **A. The appointment time? There's some for**
15 **8:00 o'clock. I cannot remember.**

16 BY MR. MORRISSEY:

17 Q. What about the time the patient is to
18 be seen by the oral surgeon, is there generally
19 a 10-, 20-minute time period that you schedule
20 the patient to be seen by the oral surgeon?

21 MS. MCELROY: Objection, form,
22 foundation. You can answer if you know.
23 BY THE WITNESS:

24 **A. I'm not understanding the question.**

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1 BY MR. MORRISSEY:

2 Q. To your knowledge, is there a duration
3 that appointments are scheduled for for the oral
4 surgeon?

5 **A. No.**

6 Q. Do you know how long it takes a Stroger
7 oral surgeon to extract a wisdom tooth?

8 MS. MCELROY: Objection, form,
9 foundation.

10 BY THE WITNESS:

11 **A. I don't know.**

12 BY MR. MORRISSEY:

13 Q. You mentioned on the referral order
14 that you would receive from a dentist referring
15 a patient from the Cook County Jail to the oral
16 surgeon, there would be a date that the dentist
17 made the referral?

18 **A. Yes, there's a date.**

19 Q. From looking at Exhibit 2, page 1504,
20 does it reflect that you scheduled an
21 appointment on 4/9/2018?

22 **A. Yes.**

23 Q. On or before 4/9/2018, would you have
24 received a referral order from the dentist?

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1 **A. Can you repeat that?**

2 Q. On or before April 9th of 2018, based
3 on your review of this record, would you have
4 received a referral order from the dentist for
5 this patient to be seen by oral surgery?

6 **A. Are you talking about the detainee?**

7 Q. Correct.

8 **A. I would not recall that information.**

9 Q. But from looking at page 1504, do you
10 agree that this patient was scheduled to be seen
11 by the oral surgeon?

12 **A. Yes.**

13 Q. And would you agree that you scheduled
14 this patient to be seen by the oral surgeon?

15 **A. Yes.**

16 Q. Before you scheduled this patient on
17 April 9, 2018, would you agree that you would
18 have reviewed a referral order by a dentist?

19 **A. I don't have -- I'm pretty sure there**
20 **was an order, and I scheduled that appointment.**

21 Q. If there was a referral order -- Strike
22 that.

23 Do you see the referral order on page
24 1504?

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1 MS. MCELROY: If I can just interject,
2 she doesn't have her glasses. I have it
3 electronically. Can we blow this up so she
4 actually can read the document?

5 MR. MORRISSEY: Sure, you can show it
6 to her.

7 MS. MCELROY: It's page 1504. I'll
8 blow it up for you.

9 BY THE WITNESS:

10 **A. I see an order.**

11 BY MR. MORRISSEY:

12 Q. You see an order on page 1504?

13 **A. The date is May 21st, 2018. Is that an**
14 **order?**

15 Q. Does the order that you see on page
16 1504 identify the dentist at the jail who
17 referred this patient to be seen by the oral
18 surgeon?

19 **A. I don't see the doctor's name.**

20 Q. When you receive a referral order for a
21 patient at the jail to be seen by an oral
22 surgeon, do you always see a dentist's name on
23 the referral order?

24 **A. Yes.**

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1 Q. When you receive a referral order from
2 a dentist at the Cook County Jail to see an oral
3 surgeon, is there always a date the dentist
4 entered the referral?

5 **A. Yes.**

6 Q. Looking at page 1504 where your
7 attorney just showed you on her computer, would
8 you agree this is not the referral order that
9 you used to generate this appointment because
10 there is no dentist identified on the order and
11 the date is the date the person was actually
12 seen by the oral surgeon?

13 **A. I don't see an oral surgeon's name on**
14 **that page.**

15 Q. Do you mean a dentist?

16 **A. Yes.**

17 Q. So you don't see a dentist on page 1504
18 that you recognize from the Cook County Jail?

19 **A. No.**

20 Q. Do you know a woman by the name of
21 Karen Williams Bouie?

22 **A. I have seen her name, but I do not know**
23 **who she is.**

24 Q. We may have been over this, but do you

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1 know Elizabeth Rivera?

2 **A. I know who she is.**

3 Q. And is she a clerk in the oral surgery
4 office?

5 **A. Yes.**

6 Q. From looking at page 1504, can you
7 identify when this patient was referred by a
8 dentist to be seen by the oral surgeon?

9 MS. MCELROY: You can also look at the
10 large version here.

11 BY THE WITNESS:

12 **A. It's not on that information. I don't**
13 **see a date when it was requested. I don't see**
14 **it.**

15 BY MR. MORRISSEY:

16 Q. If you were in your office, would you
17 be able to identify that information?

18 **A. Yes, you can see it in Cerner.**

19 Q. How difficult would it be for you to
20 obtain that information?

21 **A. It's not difficult.**

22 Q. I want to direct your attention to
23 Exhibit 2, page 1508, if you want to look at
24 counsel's computer or use my computer.

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1 **A. Okay.**

2 Q. Do you see that page, ma'am?

3 **A. Yes.**

4 Q. Did you review this document prior to
5 coming here today to testify?

6 **A. Today.**

7 Q. Before today, have you ever seen this
8 document before?

9 **A. No.**

10 Q. As a clerk, are you able to print out
11 this type of information?

12 **A. I can see it in Cerner.**

13 Q. Does it look different in Cerner as it
14 does appear on this page?

15 **A. That one looks different.**

16 Q. You're talking about the document I'm
17 showing you looks different than how it appears
18 in Cerner?

19 **A. Maybe because I'm not looking at the
20 computer.**

21 MS. MCELROY: Feel free to look at it
22 and scroll up and down.

23 THE WITNESS: Okay. I see when it was
24 requested.

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1 BY MR. MORRISSEY:

2 Q. When was it requested?

3 **A. November 5th, 2018.**

4 Q. From looking at page 1508, do you know
5 what was requested on that date?

6 **A. Surgical extraction.**

7 Q. Where do you see that?

8 **A. Under referral, it says surgical**
9 **extraction.**

10 Q. Can you circle that on the page?

11 **A. (Witness indicating).**

12 Q. You're circling surgical extraction
13 under the orders section?

14 **A. Yes.**

15 Q. Do you know who entered that order for
16 surgical extraction?

17 **A. It was requested by Brenda Taylor. I**
18 **do not know if she's the one who entered that**
19 **information in the system.**

20 Q. Is there any information on page 1508
21 identifying the referral entered by Brenda
22 Taylor for this patient?

23 **A. Regarding what? The diagnosis or what?**

24 Q. Correct, diagnosis.

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1 **A. I don't see a diagnosis on here. I**
2 **only see surgical extraction.**

3 Q. And you scheduled an appointment on
4 11/6/2018?

5 **A. Yes.**

6 Q. Before you scheduled this appointment,
7 would you have reviewed a referral by a jail
8 dentist?

9 **A. I'm sorry?**

10 Q. Before you scheduled this patient on
11 November 6, 2018, would you agree that you would
12 have received a referral order by a jail
13 dentist?

14 **A. If I received an order for an inmate,**
15 **it should be in the orders in Cerner.**

16 Q. And that referral order would have a
17 diagnosis?

18 **A. Yes.**

19 Q. In looking at page 1508, would you
20 agree that you do not see a diagnosis for this
21 patient?

22 **A. I don't see a diagnosis. I don't know**
23 **if it's different from Cerner.**

24 Q. If you were at your work computer,

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1 would you be able to retrieve the referral order
2 for this patient?

3 **A. Yes.**

4 Q. How difficult would it be for you to
5 access that information?

6 **A. It's not difficult.**

7 Q. Looking at page 1508, can you identify
8 which date you scheduled this patient to be seen
9 by an oral surgeon?

10 **A. November 6, 2018.**

11 Q. Do you know when this patient was seen
12 by an oral surgeon?

13 **A. 2/6/2019.**

14 Q. Do you know why 2/6/2019 was the date
15 selected for this patient to be seen by the oral
16 surgeon?

17 **A. It was the next available appointment.**

18 Q. Would you agree when you scheduled this
19 patient on November 6, 2018, there was nothing
20 you could do to move up the date for this
21 patient to see an oral surgeon?

22 **A. Correct.**

23 Q. As a clerk assigned to the county
24 health system, have you ever been able to

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1 advance a date for a patient at the Cook County
2 Jail to see an oral surgeon?

3 **A. No.**

4 Q. As a clerk working for the county
5 health system, have you ever been notified that
6 an inmate at the jail was expedited to see an
7 oral surgeon?

8 **A. No.**

9 Q. To your knowledge, are inmates at the
10 Cook County Jail notified when their oral
11 surgery appointment date is?

12 **A. I'm pretty sure they are.**

13 Q. How do you know that?

14 MS. MCELROY: Objection, form,
15 foundation. Answer if you know.

16 BY THE WITNESS:

17 **A. I was told by my supervisor that**
18 **people -- staff in Cermak have a way of knowing**
19 **when their detainees have appointments.**

20 BY MR. MORRISSEY:

21 Q. Do you know whether inmates at the jail
22 are notified when the oral surgery appointment
23 is scheduled?

24 MS. MCELROY: Objection, form,

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1 foundation. Answer if you know.

2 BY THE WITNESS:

3 **A. I don't know.**

4 BY MR. MORRISSEY:

5 Q. When you schedule patients at the jail
6 for oral surgery, at times, do you see referral
7 orders indicating the patient is in pain?

8 **A. Yes.**

9 Q. While that patient waits to be seen by
10 an oral surgeon, do you know who is responsible
11 for treating that patient's pain?

12 MS. MCELROY: Objection, form,
13 foundation. Answer if you know.

14 BY THE WITNESS:

15 **A. I don't know.**

16 BY MR. MORRISSEY:

17 Q. When you look at referral orders
18 indicating that a patient is in pain, how have
19 you seen it documented in the order?

20 **A. How is it documented?**

21 Q. Correct.

22 **A. It's in the comments box right next to**
23 **diagnosis.**

24 Q. Is the pain level a numeric number?

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1 **A. I don't know.**

2 Q. Have you ever seen pain in the comments
3 section rated on a numeric scale?

4 **A. I had never seen it rated.**

5 Q. Does it just say pain?

6 **A. Yes.**

7 MR. MORRISSEY: I'm going to mark a
8 medical record from Dr. Brenda Taylor dated
9 9/6/2018, it's Ammons-County 1173 and 1174,
10 as Exhibit 3.

11 (Whereupon, Deposition

12 Exhibit No. 3 was marked for
13 identification.)

14 BY MR. MORRISSEY:

15 Q. Going back to Exhibit 2 that you
16 circled earlier, are you aware that we're
17 talking about a patient by the name of Keymon
18 Ammons in this case?

19 **A. Yes.**

20 Q. And are you aware that the scheduling
21 records we have looked at so far, Exhibit 1 and
22 Exhibit 2, relate to Keymon Ammons?

23 **A. Yes.**

24 Q. Do you have any independent

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1 recollection of scheduling Keymon Ammons for
2 oral surgery?

3 **A. I would not remember.**

4 Q. From looking at the records and
5 preparing yourself today to testify, are you
6 aware that he saw an oral surgeon twice?

7 **A. Yes.**

8 Q. One time was in May. A second time --
9 Strike that.

10 The first time was in May of 2018, and
11 the second time was in February of 2019?

12 **A. Yes.**

13 Q. Exhibit 3, do you see it's signed by
14 Brenda Taylor? At the top, perform information,
15 Brenda Taylor, and then page 1174, it says
16 signed on September 6, 2018, Brenda Taylor on
17 the second page; do you see that?

18 **A. I see that.**

19 Q. Have you ever looked at this record
20 before?

21 **A. No.**

22 Q. About halfway down on the first page,
23 there's a description. Do you see where it says
24 on the top half of the page: PT stated he is

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1 having pain from his wisdom tooth. PT stated
2 pain was a 10. PT stated he was waiting on
3 appointment for Stroger, but it was taking too
4 long for his, so he put in HSRF. PT has a
5 Stroger appointment October 2018. Do you see
6 that?

7 **A. I see that.**

8 Q. As a clerk who scheduled patients for
9 oral surgery, how could you identify whether a
10 patient like Keymon Ammons had an appointment
11 for October of 2018?

12 **A. How I can identify it now?**

13 Q. Yes.

14 **A. That the patient had --**

15 Q. Yeah.

16 **A. I can go in Cerner and see that**
17 **information, the patient inquiry.**

18 Q. Where specifically in Cerner?

19 **A. I would have to show you in the**
20 **computer in the Cerner system if you want to see**
21 **it, but it's in the patient inquiry, and I would**
22 **have to enter the beginning date and ending**
23 **date, and you can see that information.**

24 Q. Have you ever seen Stroger oral surgery

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1 appointments canceled in the patient inquiry?

2 **A. Yes.**

3 Q. Do you have any knowledge whether this
4 patient was scheduled for a Stroger oral surgery
5 appointment in October of 2018?

6 **A. If it's on this paperwork.**

7 Q. Are you referring to Exhibit 2 or
8 Exhibit 3?

9 MS. MCELROY: Objection, form,
10 foundation. She has never seen Exhibit 3
11 before.

12 MR. MORRISSEY: I don't think she's
13 seen 2 before either.

14 MS. MCELROY: Same objection, 2 and 3.
15 BY MR. MORRISSEY:

16 Q. As a scheduler, can you delete an
17 appointment?

18 **A. I can cancel.**

19 Q. How about delete?

20 **A. No.**

21 Q. As a scheduler for oral surgery, can
22 you identify whether a patient at the Cook
23 County Jail is a no-show for an appointment?

24 **A. Yes.**

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1 Q. How do you do that?

2 A. I can go in the patient inquiry, enter
3 start date and ending date, and you can see
4 that.

5 Q. Do you periodically run reports about
6 the number of patients from the Cook County Jail
7 that are no-shows for oral surgery appointments?

8 A. I don't.

9 Q. Do you know whether your supervisor
10 does?

11 A. No.

12 Q. Did you ever discuss that information
13 with your supervisor?

14 A. Never discussed it.

15 Q. If a patient calls you in the general
16 public to schedule an oral surgery appointment
17 and reports he or she is in pain, is it your
18 practice to tell the patient to call the hotline
19 number for a quicker appointment date?

20 A. Yes.

21 Q. Why do you do that?

22 A. Because they can get a sooner date than
23 what I have available.

24 Q. Have you been trained to provide that

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1 information to patients who call?

2 **A. I was instructed to give that**
3 **information.**

4 Q. Who instructed you?

5 **A. My supervisor, Shavon Tannan.**

6 Q. Is there anything that triggers you to
7 provide that -- Strike that.

8 What training did your supervisor give
9 you regarding telling people who call up on the
10 phone about a hotline for a next business day
11 appointment?

12 **A. She instructed me to give that**
13 **information to patients if they need to be seen**
14 **quicker than what we have in the system**
15 **especially if they're in a lot of pain.**

16 Q. Did she tell you what she meant by pain
17 level?

18 MS. MCELROY: Objection to foundation,
19 speculation. Answer if you know.

20 BY THE WITNESS:

21 **A. I don't know.**

22 BY MR. MORRISSEY:

23 Q. Do you frequently tell patients who
24 call you in the general public to call the

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1 hotline number for a quicker appointment?

2 **A. Yes.**

3 Q. Do you do that on a daily basis?

4 **A. Just about.**

5 Q. Do you know whether that instruction to
6 patients in the general public helps expedite an
7 oral surgery appointment?

8 MS. MCELROY: Objection, form,
9 foundation. Answer if you know.

10 BY THE WITNESS:

11 **A. I don't know.**

12 BY MR. MORRISSEY:

13 Q. You have no knowledge whether referring
14 patients to a hotline number allows the patient
15 to be seen by an oral surgeon on a quicker
16 basis?

17 MS. MCELROY: Same objection.

18 BY THE WITNESS:

19 **A. I don't know.**

20 BY MR. MORRISSEY:

21 Q. Why do you give patients who complain
22 to you of pain that call on the phone a hotline
23 number to see an oral surgeon the next business
24 day?

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1 **A. They can be seen faster.**

2 Q. That was told to you by your
3 supervisor?

4 **A. Yes.**

5 Q. If a patient calls you in the general
6 public and you provide information to call a
7 hotline number, would you still schedule the
8 patient to be seen by an oral surgeon?

9 **A. Sometimes I do.**

10 Q. Under what circumstances would you
11 schedule the patient even after you give them
12 the number to the hotline?

13 **A. Sometimes a patient complain they can't**
14 **get through, so they do take the date that I**
15 **have, and I still give them the information to**
16 **the hotline.**

17 Q. So if a patient tells you that they can
18 make it through pain until the next available
19 appointment you can provide them, you move
20 forward with scheduling the appointment at the
21 request of the patient?

22 **A. Yes.**

23 Q. Inmates at the jail don't have that
24 option, correct?

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1 **A. I don't know.**

2 Q. You're not aware --

3 **A. I'm not aware of that information.**

4 Q. You're not aware of anybody else in
5 your office that schedules patients to be seen
6 by the oral surgeon?

7 **A. I think I did mention 2 other people**
8 **that have access to scheduling in my area.**

9 Q. How long have those 2 other people been
10 scheduling patients at the jail for oral
11 surgery?

12 **A. They don't schedule for detainees.**
13 **They schedule for general public.**

14 Q. So you're the only person in your
15 office that schedules inmates at the jail for
16 oral surgery?

17 **A. The orders, yes.**

18 Q. And orders are the only way for an
19 inmate at the Cook County Jail to be seen by an
20 oral surgeon based on your knowledge?

21 **A. Based on my knowledge, yes.**

22 Q. Do you know anybody who works for
23 Cermak Health Services?

24 **A. No.**

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1 Q. Do you have any contact at Cermak
2 Health Services?

3 A. No.

4 Q. Have you ever called Cermak Health
5 Services relating to the scheduling of a patient
6 at the jail for oral surgery?

7 A. When we had the IRIS system, it was
8 different.

9 Q. That was several years ago, right?

10 A. Right.

11 Q. Since you moved away from the IRIS
12 system, have you ever contacted anybody from
13 Cermak regarding the scheduling of a patient for
14 oral surgery?

15 A. No.

16 Q. In the last 3 years, have you ever had
17 a phone conversation with a jail dentist?

18 A. No.

19 Q. In the last 3 years, have you ever had
20 a phone conversation with a dental assistant at
21 the Cook County Jail?

22 A. No.

23 Q. In the last 3 years, have you ever
24 emailed a dentist at the Cook County Jail?

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1 **A. No.**

2 Q. In the last 3 years, have you ever
3 emailed a dental assistant at the Cook County
4 Jail?

5 **A. No.**

6 Q. If an inmate is in significant dental
7 pain, is there any way for you to schedule the
8 patient to be seen by an oral surgeon other than
9 the next available date in the computer system?

10 **A. No.**

11 MR. MORRISSEY: I have nothing further.

12 MS. MCELROY: I have a few questions.

13 EXAMINATION.

14 BY MS. MCELROY:

15 Q. Ms. Macias, do all referrals for
16 detainees for oral surgery only come to you
17 electronically through Cerner?

18 **A. Yes.**

19 Q. Do all orders for detainees for oral
20 surgery only come to you electronically?

21 **A. Yes.**

22 Q. Are all orders contained in Cerner?

23 **A. They're in Cerner.**

24 Q. Are all comments regarding a referral

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1 of a detainee for oral surgery contained in the
2 Cerner medical record?

3 **A. Can you repeat that?**

4 Q. Sure. Are all comments regarding a
5 referral of a detainee for oral surgery
6 contained in the Cerner medical record for that
7 detainee?

8 **A. Yes.**

9 Q. Are all diagnoses regarding a referral
10 of a detainee for oral surgery contained in the
11 Cerner medical record for that detainee?

12 **A. Yes.**

13 Q. Are referrals kept anywhere other than
14 Cerner?

15 **A. Only in Cerner.**

16 Q. Are scheduling records kept anywhere
17 other than Cerner?

18 **A. Only in Cerner.**

19 Q. Do you ever receive referrals for oral
20 surgery for detainees that do not list tooth
21 numbers?

22 **A. I don't know.**

23 Q. Do you ever receive referrals for oral
24 surgery for detainees that do not have a

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1 diagnosis?

2 MR. MORRISSEY: Asked and answered.

3 MS. MCELROY: You can answer if you
4 know.

5 BY THE WITNESS:

6 **A. They all have a diagnosis.**

7 BY MS. MCELROY:

8 Q. Ms. Macias, I'm going to show you on my
9 computer what has been previously produced in
10 this case. It is Bates Ammons-County 00573
11 through Ammons-County 00576.

12 MR. MORRISSEY: Well, show it to me.

13 MS. MCELROY: Sure. I'll show you all
14 the pages. May I turn the computer back
15 towards her so she can view it?

16 MR. MORRISSEY: Sure, but I would like
17 to see what you're looking at.

18 MS. MCELROY: Sure.

19 BY MS. MCELROY:

20 Q. I'm going to go to the first Bates page
21 number which is Ammons-County 00573. Have you
22 seen a screen similar to this in the Cerner
23 program?

24 **A. Yes.**

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1 Q. Can you tell me what this screen is?

2 A. That's the appointment visits that
3 Ammons has had.

4 Q. Is this the patient inquiry screen that
5 you referred to earlier?

6 A. Yes.

7 Q. What is it called specifically? Is it
8 the person schedule inquiry standard? Does it
9 say person schedule inquiry standard? Can you
10 see it?

11 A. Yeah, I can see it.

12 Q. And the person is Keymon Ammons,
13 correct?

14 A. Correct.

15 Q. Do you see there's a start date? Is
16 that the start date that you were referring to
17 earlier?

18 A. Yes.

19 Q. And there's an end date, and that's the
20 end date that you were referring to earlier,
21 correct?

22 A. Correct.

23 Q. So can you tell me the purpose of this
24 screen?

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1 **A. You can see the past appointments on**
2 **this screen that the patient had.**

3 Q. So this is where you would go if you
4 wanted to see all the patients' or detainees'
5 past booked appointments?

6 **A. Correct.**

7 Q. And this screen will show you whether
8 an appointment had been booked for a detainee or
9 a patient, correct?

10 **A. Yes.**

11 Q. Can you tell me, does it show all
12 booked, canceled appointments?

13 **A. Yes.**

14 Q. What other types of appointments does
15 this inquiry show?

16 **A. Rescheduled, checked out, no-show,**
17 **checked in, canceled, rescheduled.**

18 Q. Thank you. I'm going to scroll to the
19 next page which is Ammons-County 574. Do you
20 see that?

21 **A. Yes.**

22 MS. MCELROY: Would you like to see
23 that, Mr. Morrissey?

24 MR. MORRISSEY: I have it.

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1 BY MS. MCELROY:

2 Q. Earlier plaintiff's counsel showed you
3 Bates labeled documents Ammons-County 001504 and
4 Ammons-County 001508. I believe that was
5 Plaintiff's Exhibit No. 2. Now, if we can go
6 back to the screen and look at Ammons-County
7 00574, can you tell me if you recognize this
8 screen?

9 A. Yes.

10 Q. What is the purpose of this screen?

11 A. It shows that I scheduled this
12 appointment April 9, 2018, confirmed it, booked
13 it; Rivera Elizabeth checked the patient in;
14 seen by Dr. Shanshal May 21st, 2018; and
15 Williams Bouie Karen checked the patient out
16 May 21st, 2018.

17 Q. Now, this screen is accessible through
18 Cerner, correct?

19 A. Yes.

20 Q. And you have access to these tabs here?

21 A. Yes.

22 MR. MORRISSEY: Well, it's not
23 complete. The document you're showing her
24 is incomplete.

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1 MS. MCELROY: If you will let me
2 continue with my line of questioning,
3 perhaps that will be resolved for you.

4 MR. MORRISSEY: That's fine, but it's
5 not complete.

6 BY MS. MCELROY:

7 Q. Now, I want to direct your attention to
8 Ammons-County 1504. This is a report -- a
9 printed report from Cerner that I showed you
10 earlier.

11 MR. MORRISSEY: She has no knowledge
12 about where the report was printed. Even in
13 your objection, you said she has no
14 knowledge about the form.

15 MS. MCELROY: Objection noted. We'll
16 continue.

17 BY MS. MCELROY:

18 Q. This is the form that I showed you
19 earlier. Would you review the contents of the
20 form? If you would like to see it in a larger
21 screen, I would be more than happy to display it
22 for you.

23 A. Please.

24 Q. And to be clear, Ms. Macias, you are

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1 looking at the digital version of Ammons-County
2 001504. Would you compare the information on
3 this page and tell me whether it is the same
4 information that you can access in Cerner at
5 your computer terminal when scheduling a
6 detainee?

7 MR. MORRISSEY: Object to the form of
8 the question. I object to the extent
9 there's different information on the 2
10 different pages you're referring to.

11 MS. MCELROY: Please allow the witness
12 to testify whether or not the information is
13 the same as in Cerner. This is not your
14 deposition, Mr. Morrissey. With all due
15 respect, make your objection and allow the
16 witness to testify.

17 MR. MORRISSEY: My objection is that
18 the 2 documents that you're having her
19 compare show different information.

20 MS. MCELROY: I think she's trying to
21 clarify that right now.

22 BY MS. MCELROY:

23 Q. Ms. Macias, would you please continue
24 to review the page and tell me whether the

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1 information contained on Ammons-County 1504 is
2 largely the same that you can access on your
3 computer terminal in Cerner at your work?

4 **A. Yes, it's the same.**

5 Q. Okay. I'm going to direct your
6 attention to event details. Do you have access
7 to that tab in Cerner?

8 **A. Yes.**

9 Q. And do you see anything under field
10 name, schedule indicator, or priority?

11 **A. I don't see anything now.**

12 Q. Do you have access to the orders tab?

13 **A. Yes.**

14 Q. Do you see anything under the orders
15 tab?

16 **A. No.**

17 Q. Now, as far as the action history is
18 concerned, you have access in Cerner to the
19 action history, correct?

20 **A. Yes.**

21 Q. Let me go back up. I apologize. I
22 scrolled down too far. I'm going to start the
23 line of questioning again. We were looking at
24 Ammons-County 1505 just now. We're going to

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1 start again. I apologize. So let's go to
2 Ammons-County 001504, and let's start at the
3 beginning of this page again. Can you please
4 tell me what event details, which would be the
5 event details tab in Cerner, what does that
6 indicate?

7 MR. MORRISSEY: Are you asking her to
8 read document 1504?

9 MS. MCELROY: I'm asking her if there
10 are any event details under the event
11 details tab in this printout.

12 BY THE WITNESS:

13 **A. There's nothing there.**

14 BY MS. MCELROY:

15 Q. Resources, is there anything under the
16 resources tab for this page?

17 **A. I see oral maxillofacial.**

18 Q. Is that what you would see typically
19 when you looked at the resources tab on your
20 computer in the Cerner program at your desk?

21 **A. I don't remember that.**

22 Q. The orders tab that is denoted here on
23 page Ammons-County 1504 is the same information
24 that is contained in the Cerner tab; it's just a

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1 printout of it?

2 MR. MORRISSEY: I object to the extent
3 we already went over this, and she testified
4 that the orders tab from the referring
5 dentist would have different information.
6 So to the extent you're asking her
7 mischaracterizes her prior testimony. I
8 object.

9 MS. MCELROY: Objection noted.

10 BY MS. MCELROY:

11 Q. Ms. Macias, under the orders section,
12 when you click on that tab in Cerner, is this
13 the language that's denoted here under this
14 order, is that common language that you would
15 find in an order?

16 A. Yes, dental extraction.

17 Q. So it is the common language that you
18 would see in an order that was referred by a
19 dentist from Cermak Health Services to Stroger
20 for oral surgery?

21 MR. MORRISSEY: I object to the extent
22 that mischaracterizes what she testified
23 earlier.

24 MS. MCELROY: Objection noted. You may

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1 answer the question.

2 BY MS. MCELROY:

3 Q. Would you like me to ask it again?

4 **A. Sure.**

5 Q. Under the orders section that is
6 denoted here, is this common language that you
7 would come across in an order that you would
8 receive from a dentist at Cermak Health Services
9 from the oral surgery department -- to the oral
10 surgery department?

11 MR. MORRISSEY: That misrepresents her
12 testimony in the record. The dentist makes
13 a referral for an oral surgeon. This is an
14 order from a specific date that she actually
15 scheduled. So you're mischaracterizing and
16 misrepresenting these records to the
17 witness.

18 MS. MCELROY: I'm not. I'm asking her
19 the contents of the order. Your objection
20 is noted.

21 BY MS. MCELROY:

22 Q. Ms. Macias, would you like me to ask
23 the question again so that we're not interrupted
24 by Mr. Morrissey?

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1 **A. Yes.**

2 Q. Thank you. Ms. Macias, the orders
3 section that is contained on this page, directly
4 below, it states dental extraction, clinic
5 refer, request date and time 5/21/18, 1330 CDT,
6 referral reason, surgical extraction, Stroger,
7 schedule indicator, Cermak patient?

8 MR. MORRISSEY: Objection,
9 mischaracterizes her testimony.

10 BY THE WITNESS:

11 **A. Yes.**

12 BY MS. MCELROY:

13 Q. Is this information common information
14 that you would receive from a dentist at Cermak
15 Health Services to schedule a detainee for oral
16 surgery at Stroger?

17 **A. Yes.**

18 Q. Does it appear exactly like this or
19 very similar to this when you look at your
20 screen on Cerner while you are at your desk when
21 you are scheduling detainees for oral surgery?

22 MR. MORRISSEY: I object. She's never
23 seen the document you're asking her about,
24 1508. Even you made the objection that she

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1 has no knowledge about the document.

2 MS. MCELROY: I'm showing it to her
3 right now and asking her if the language is
4 common. She schedules all day, every day
5 for the past 29 years. I believe that she
6 would have some knowledge as to the language
7 that is used in orders. To say that she
8 does not is rather insulting.

9 MR. MORRISSEY: Well --

10 MS. MCELROY: Do you have an objection?

11 MR. MORRISSEY: My objection is, she
12 testified that there's other information in
13 the scheduling system about -- indicating
14 the date by the dentist, the referral, she
15 identified that there would be a diagnosis,
16 neither of which are given. As you
17 indicated, she's been doing this for quite
18 some time. In the records you have given
19 me, from the witness' own testimony are not
20 complete.

21 MS. MCELROY: Objection noted. We'll
22 continue with the line of questioning.
23
24

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1 BY MS. MCELROY:

2 Q. Ms. Macias, is there always a requested
3 date for the referral on the order?

4 MR. MORRISSEY: Asked and answered.

5 BY THE WITNESS:

6 **A. Yes.**

7 BY MS. MCELROY:

8 Q. Is there always a diagnosis on the
9 order?

10 MR. MORRISSEY: Asked and answered.

11 BY THE WITNESS:

12 **A. Yes.**

13 BY MS. MCELROY:

14 Q. We are going to now go to Ammons-County
15 1508 which I have blown up on my laptop screen.
16 I will show it to you.

17 MR. MORRISSEY: What page are you at?

18 MS. MCELROY: As I previously stated,
19 we are looking at Ammons-County 1508 which
20 was previously produced to you last night.

21 BY MS. MCELROY:

22 Q. Ms. Macias, when you are at your place
23 of employment performing your duties as a
24 scheduler and you are in Cerner, do you see the

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1 event details of every order?

2 **A. Do I see it?**

3 Q. Do you see the event details tab in
4 Cerner?

5 **A. I see it, yes.**

6 Q. So you can access the event details in
7 Cerner?

8 **A. If I want to.**

9 Q. By looking at the event details, who is
10 the scheduling ordering physician for this
11 event?

12 **A. Brenda Taylor.**

13 Q. And this is the same information that
14 you would see in Cerner?

15 **A. Yes.**

16 Q. If we go down to the orders tab which
17 is a printout of Cerner, when you are at your
18 place of employment in Cerner looking at orders,
19 is this the same type of information that you
20 would see in the orders tab?

21 **A. Yes.**

22 MR. MORRISSEY: I object to the extent
23 it mischaracterizes the prior testimony.
24

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1 BY MS. MCELROY:

2 Q. Is the information contained in the
3 orders section common language that you see when
4 processing orders?

5 **A. It's common language.**

6 MR. MORRISSEY: Why don't we take a
7 break.

8 (Whereupon, a short break was
9 taken.)

10 BY MS. MCELROY:

11 Q. We were previously looking at
12 Ammons-County 1508. I pulled that back up on my
13 screen for you. And I believe we were going
14 over the orders tab, and you confirmed that the
15 information contained under the orders tab is
16 common language that you receive when you
17 receive an order from a dental -- from a dentist
18 at Cermak Health Services for a referral for
19 oral surgery to Stroger, correct?

20 MR. MORRISSEY: I object to the extent
21 that mischaracterizes her testimony.

22 MS. MCELROY: I'm asking her a
23 question. I'm not asking her about her
24 previous testimony. You may answer.

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1 MR. MORRISSEY: I object it's been
2 asked and answered.

3 MS. MCELROY: You made the objection
4 twice now. You may answer.

5 BY THE WITNESS:

6 **A. It's common language.**

7 BY MS. MCELROY:

8 Q. Ms. Macias, the action history
9 presented here on Ammons-County 1508, can you
10 tell me if the action history contained on this
11 page is the same information contained in
12 Ammons-County 574 that we previously looked
13 at -- I'm sorry -- Strike that.

14 Ms. Macias, can you tell me if the
15 action history contained on Ammons-County 1508
16 is the same type of information that you can
17 access on your computer terminal in the Cerner
18 program while performing your duties as a
19 scheduler at Cermak?

20 **A. Yes.**

21 Q. Can you please walk me through the
22 action history of this record? Can you tell me
23 who requested the appointment that you
24 ultimately scheduled?

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1 **A. Brenda Taylor requested this**
2 **November 6, 2018. I scheduled this the next day**
3 **November 6, 2018 --**

4 Q. I just want to clarify. Can you please
5 tell me the date that Brenda Taylor referred --

6 **A. Brenda Taylor referred this patient**
7 **November 5th, 2018. I scheduled this**
8 **appointment the following day, November 6, 2018.**
9 **The patient came in 2/6/2019. Karen Williams**
10 **Bouie checked the patient in, and the patient**
11 **was seen 2/6/2019.**

12 Q. Thank you. Ms. Macias, I'm now going
13 to show you what has been previously produced as
14 Ammons-County 1441. It is an order for a dental
15 extraction. Can you access an order containing
16 this information from Cerner while you're
17 performing your duties as a scheduler at Cermak?

18 MR. MORRISSEY: Objection.

19 MS. MCELROY: You may answer.

20 BY THE WITNESS:

21 **A. Yes, you can see the orders.**

22 BY MS. MCELROY:

23 Q. The information contained in this
24 order, is it the typical information that you

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1 see in orders in Cerner while performing your
2 duties as a scheduler?

3 **A. Yes.**

4 Q. Can you tell me what the order is
5 referring this patient for?

6 MR. MORRISSEY: Objection, foundation.
7 You're mischaracterizing --

8 MS. MCELROY: It's a direct question.

9 MR. MORRISSEY: We know that scheduling
10 this order was not entered by the witness
11 and it's --

12 MS. MCELROY: She already testified
13 this is an order that she sees commonly
14 performing her duties.

15 You may answer based on the fact that
16 the plaintiff has already stated his
17 objection. It is on the record.

18 BY MS. MCELROY:

19 Q. Can you please tell me what this order
20 is being -- Strike that.

21 Can you please tell me what this
22 dentist is ordering for referral in this order
23 that is before you?

24 MR. MORRISSEY: Objection to

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1 foundation.

2 MS. MCELROY: You may answer.

3 BY THE WITNESS:

4 **A. For surgical extraction.**

5 BY MS. MCELROY:

6 Q. Can you tell me who the ordering
7 physician for this order is?

8 **A. Brenda Taylor.**

9 Q. Can you tell me when the appointment
10 for this order was made?

11 **A. Based on that request?**

12 Q. Yes.

13 **A. May 21st, 2018.**

14 Q. Is that the time of the appointment for
15 the oral surgery, or is that the date that the
16 dentist referred for oral surgery?

17 MR. MORRISSEY: Objection to
18 foundation.

19 MS. MCELROY: You may answer. If you
20 don't know, you don't know.

21 BY THE WITNESS:

22 **A. It was requested.**
23
24

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1 BY MS. MCELROY:

2 Q. Thank you. Ms. Macias, during your
3 duties when you are scheduling detainees for
4 oral surgery appointments, do you commonly look
5 at the general tab when scheduling?

6 **A. What general tab?**

7 Q. We're going to go back to Ammons-County
8 00574. Ms. Macias, is this an accurate
9 depiction of what you see in Cerner when
10 scheduling?

11 MR. MORRISSEY: Objection. The
12 document is incomplete.

13 BY MS. MCELROY:

14 Q. Ms. Macias, when scheduling a patient,
15 is this the screen that you see in Cerner?

16 **A. If I want to see something from the**
17 **past, that's the only -- other than that, I**
18 **don't have to.**

19 Q. Ms. Macias, how often do you check the
20 resources tab?

21 **A. When I'm looking for something.**

22 Q. Why would you go looking in the
23 resources tab when scheduling a detainee for
24 oral surgery?

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1 **A. I really don't have to go in there.**

2 Q. So you don't have to access the
3 resources tab?

4 **A. No, I don't have to. To complete my**
5 **assignment, I don't have to.**

6 Q. Thank you, Ms. Macias. When scheduling
7 a detainee for oral surgery at Stroger, do you
8 always look at the orders that are contained in
9 the orders tab?

10 **A. No.**

11 Q. Why not?

12 **A. Because I think that's really for the**
13 **oral surgeon.**

14 Q. So you do not have to access the orders
15 tab to perform your duties as a scheduler for
16 Cermak Health Services?

17 MR. MORRISSEY: Objection, asked and
18 answered.

19 BY THE WITNESS:

20 **A. I don't have to.**

21 BY MS. MCELROY:

22 Q. Thank you, Ms. Macias. Do you
23 routinely or always -- Strike that.

24 Ms. Macias, do you always check the

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1 instructions tab when scheduling a detainee for
2 oral surgery?

3 **A. No.**

4 Q. Why not?

5 **A. I don't have to.**

6 Q. Ms. Macias, do you always check the
7 scheduling comments tab when scheduling a
8 detainee for oral surgery?

9 **A. No.**

10 Q. Why not?

11 **A. Because I don't have to.**

12 Q. So it's not required for you to check
13 the scheduling comments when performing your
14 duties as a scheduler; is that correct?

15 **A. Correct.**

16 Q. Thank you. Ms. Macias, do you always
17 check the reports tab when scheduling a detainee
18 for oral surgery?

19 **A. No.**

20 Q. And why not?

21 **A. It's not required.**

22 Q. Ms. Macias, do you always check the
23 booking notes tab when scheduling a detainee for
24 oral surgery when you receive a referral for

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1 oral surgery?

2 **A. No.**

3 Q. And why not?

4 **A. Because it's not required to perform my**
5 **duties.**

6 Q. In summary, Ms. Macias, you do not have
7 to check the resources tab, the orders tab, the
8 action history tab, the instructions tab, the
9 scheduling comments tab -- Strike that. We'll
10 go one by one.

11 Ms. Macias, it's correct that you do not
12 have to access the resources tab when
13 scheduling, correct?

14 **A. Correct.**

15 Q. Thank you. Ms. Macias, it is correct
16 that you do not have to access the orders tab in
17 Cerner when scheduling a detainee, correct?

18 **A. Correct.**

19 Q. Ms. Macias, it is correct that you do
20 not have to access the instructions tab in
21 Cerner when scheduling a detainee for oral
22 surgery, correct?

23 **A. Correct.**

24 Q. Ms. Macias, it is correct that you do

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1 not have to access the scheduling comments tab
2 in Cerner when scheduling a detainee for oral
3 surgery, correct?

4 **A. Correct.**

5 Q. Ms. Macias, it is correct that you do
6 not have to access the reports tab when
7 scheduling a detainee for oral surgery at
8 Stroger, correct?

9 **A. Correct.**

10 Q. Ms. Macias, it is correct that you do
11 not have to access the booking notes when
12 scheduling a detainee for oral surgery at
13 Stroger?

14 **A. Correct.**

15 Q. Thank you. Ms. Macias, do you have any
16 power as to when a detainee is scheduled for
17 oral surgery at Stroger Hospital?

18 **A. No.**

19 Q. Ms. Macias, as a scheduler, do you have
20 the power to change a detainee's -- Strike that.

21 Ms. Macias, do you use any independent
22 judgment when scheduling a detainee for oral
23 surgery at Stroger? That means, do you select
24 the time frame in which a detainee is scheduled

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1 for oral surgery?

2 **A. No.**

3 Q. Who determines when a detainee is
4 scheduled for oral surgery after you receive a
5 referral from Cermak Health Services?

6 MR. MORRISSEY: Objection, asked and
7 answered.

8 MS. MCELROY: You can answer.

9 BY THE WITNESS:

10 **A. The Cerner system will give me the next**
11 **available date.**

12 BY MS. MCELROY:

13 Q. Ms. Macias, as far as orders are
14 concerned and how to interpret an order, do you
15 have the training and education -- are you a
16 medical doctor to determine what an order is
17 referring a patient for?

18 **A. I'm not a medical doctor, no.**

19 MS. MCELROY: Thank you, Ms. Macias. I
20 have no further questions.

21 FURTHER EXAMINATION

22 BY MR. MORRISSEY:

23 Q. Your lawyer asked you, ma'am, what is
24 not required and you don't have to look at when

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1 you're scheduling a patient. Do you remember
2 all those questions?

3 **A. Correct.**

4 Q. What do you have to look at when you
5 schedule a patient at the jail for an oral
6 surgery referral?

7 **A. The only thing that I see, I go in the**
8 **orders, the patient's name, and I process the**
9 **appointment.**

10 Q. You mentioned when I asked you
11 questions earlier, the referral order for oral
12 surgery has the date the referral was made,
13 correct?

14 **A. Yes.**

15 Q. Do you always have access to that
16 information when you schedule a patient for oral
17 surgery who's detained at the jail?

18 **A. Yes.**

19 Q. And when you receive a referral order
20 from a dentist at the jail, it always has the
21 name of the dentist who's making the referral,
22 correct?

23 **A. Correct.**

24 Q. And you always have access to that

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1 information when you schedule a person for oral
2 surgery?

3 **A. If I want to see it, yes.**

4 Q. You mentioned there's always a
5 diagnosis on the referral order by a dentist,
6 correct?

7 **A. Yes.**

8 Q. When your lawyer asked you questions,
9 did you see any referral orders with the
10 diagnosis for Keymon Ammons?

11 **A. What I saw it was the common language**
12 **for an extraction.**

13 Q. My question is, you testified earlier
14 when I asked you questions that every referral
15 order that you look at for an inmate at the jail
16 has a diagnosis, correct?

17 **A. Correct.**

18 MR. MORRISSEY: I'm going to mark
19 Ammons-County 1165 as Exhibit 4.

20 (Whereupon, Deposition
21 Exhibit No. 4 was marked for
22 identification.)
23
24

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1 BY MR. MORRISSEY:

2 Q. Ma'am, I'm showing you a 2-page
3 document, Ammons-County 1165, 1166. Do you see
4 that document?

5 **A. Yes.**

6 Q. Do you see on the bottom of the page,
7 there's a progress note?

8 MS. MCELROY: Objection, form,
9 foundation. This is a Dentrrix record which
10 Ms. Macias does not have access to nor has
11 she ever seen. She previously stated that
12 she does not even have access to the Dentrrix
13 system.

14 MR. MORRISSEY: This may be the record
15 that interfaces with Cerner.

16 BY MR. MORRISSEY:

17 Q. Do you see the document, ma'am?

18 **A. Yes.**

19 Q. Do you see where it says 4/9/2018, and
20 there's a number 1 below tooth?

21 MS. MCELROY: Objection, form,
22 foundation. You can answer if you know
23 what's going on here.
24

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1 BY THE WITNESS:

2 **A. I see the 4/9/2018.**

3 BY MR. MORRISSEY:

4 Q. Do you see there's number 1 next to it?

5 **A. I see that, yes.**

6 Q. And that's below the column, tooth?

7 **A. Yes.**

8 Q. There's a procedure code. Do you see
9 that, PROC D7210?

10 MS. MCELROY: Objection, form,

11 foundation.

12 BY MR. MORRISSEY:

13 Q. Do you see that?

14 **A. I don't. Sorry.**

15 Q. To the right of 1 --

16 **A. Here. Okay.**

17 Q. As a clerk scheduling people for oral
18 surgery, have you ever seen procedure codes?

19 MS. MCELROY: Objection, form,

20 foundation.

21 BY THE WITNESS:

22 **A. If I'm not mistaken, I think it's an**
23 **ICD-10 code.**

24

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1 BY MR. MORRISSEY:

2 Q. Have you seen those types of codes
3 before?

4 **A. Yes, I have.**

5 Q. And to the right of that, do you see
6 where it says provider? There's a column
7 provider, it says DRTAY?

8 MS. MCELROY: Objection, form,
9 foundation.

10 MR. MORRISSEY: I'm just asking her to
11 look at the document.

12 MS. MCELROY: And I'm able to make my
13 objections on the record.

14 BY MR. MORRISSEY:

15 Q. And then to the right of that, it says
16 description. Do you see that?

17 MS. MCELROY: Objection, form,
18 foundation.

19 BY THE WITNESS:

20 **A. I see that.**

21 BY MR. MORRISSEY:

22 Q. It says extraction-surgical/erupt
23 tooth?

24 MS. MCELROY: Same objection.

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1 BY MR. MORRISSEY:

2 Q. Do you see that?

3 **A. Uh-huh.**

4 MS. MCELROY: Same objection.

5 BY THE WITNESS:

6 **A. Yes, I see that.**

7 BY MR. MORRISSEY:

8 Q. Do you see TP?

9 MS. MCELROY: Same objection. I'm just
10 going to object to this line of questioning
11 as it entails to this entire document so I
12 do not continue to interrupt you. My
13 apologies.

14 BY MR. MORRISSEY:

15 Q. Do you see where it says TP?

16 **A. Yes, I see that.**

17 Q. Below surgical extraction/erupt tooth,
18 do you see where it says nonfunctional tooth?

19 **A. Yes, I see that.**

20 Q. Have you ever seen nonfunctional tooth
21 as a diagnosis?

22 MS. MCELROY: Objection, form,
23 foundation. My client is not a medical
24 doctor. She does not know this language.

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1 You can answer if you know.

2 BY THE WITNESS:

3 **A. No.**

4 BY MR. MORRISSEY:

5 Q. Your lawyer was showing you some
6 documents on page 574, Ammons-County 574. Do
7 you remember looking at those tabs?

8 **A. Yes.**

9 Q. How many different tabs are there to
10 your knowledge?

11 **A. I cannot give you a number because I**
12 **don't remember.**

13 Q. More than 5?

14 **A. More than 5.**

15 Q. What types of information can be found
16 on the tabs?

17 **A. Orders that I can remember -- do I have**
18 **to answer that?**

19 MS. MCELROY: If you know what he's
20 talking about, you can answer it. If not,
21 ask for clarification. That's a very broad
22 question.

23 THE WITNESS: Can you repeat that?
24

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1 BY MR. MORRISSEY:

2 Q. Do you remember when your lawyer showed
3 you those tabs, general, details, resources,
4 instructions, and you told your lawyer you don't
5 have to look at those tabs when you schedule a
6 person for treatment?

7 MS. MCELROY: I'm sorry. She did
8 not -- I believe she testified that she does
9 not always look at them.

10 BY MR. MORRISSEY:

11 Q. Are there any other tabs that you have
12 access to in that computer platform?

13 MS. MCELROY: Objection, form,
14 foundation.

15 BY THE WITNESS:

16 **A. Those are the only ones.**

17 BY MR. MORRISSEY:

18 Q. Those are the only tabs that you have
19 access to?

20 **A. The ones on the screen, yes.**

21 Q. Can dentists at the jail -- Strike
22 that.

23 Have you ever seen a referral from a
24 jail dentist for a patient to have oral surgery

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1 on a specific date?

2 MS. MCELROY: Objection, form,
3 foundation. Answer if you know.

4 BY THE WITNESS:

5 **A. No.**

6 BY MR. MORRISSEY:

7 Q. How come?

8 MS. MCELROY: Objection, form,
9 foundation. She wouldn't know why that
10 doesn't exist. Answer if you know.

11 BY THE WITNESS:

12 **A. I don't know.**

13 BY MR. MORRISSEY:

14 Q. Have you ever seen a referral by a jail
15 dentist for a patient to see the oral surgeon
16 with a specific date for him or her to see the
17 oral surgeon?

18 MS. MCELROY: Asked and answered.

19 BY THE WITNESS:

20 **A. No.**

21 BY MR. MORRISSEY:

22 Q. To your knowledge, can a dentist at the
23 jail schedule a patient to see the oral surgeon?

24 MS. MCELROY: Objection, form,

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1 foundation. Answer if you know.

2 BY THE WITNESS:

3 **A. Not to my knowledge.**

4 BY MR. MORRISSEY:

5 Q. I want to direct your attention to page
6 1441 that your lawyer showed you.

7 MS. MCELROY: I'll need a moment to
8 pull that up.

9 BY MR. MORRISSEY:

10 Q. Do you remember your lawyer asking you
11 questions about this order?

12 **A. Yes.**

13 Q. And based on your testimony today, do
14 you understand 5/21/2018 as the date Keymon
15 Ammons saw the oral surgeon?

16 MS. MCELROY: Objection, form,
17 foundation. Answer if you know.

18 THE WITNESS: Can you repeat it?

19 BY MR. MORRISSEY:

20 Q. Do you remember that you scheduled
21 Keymon Ammons to see the oral surgeon on
22 5/21/2018?

23 **A. Do I remember?**

24 Q. Correct.

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1 **A. No.**

2 Q. Do you remember testifying that you
3 looked at records showing that you scheduled him
4 to be seen by the oral surgeon that day?

5 **A. According to the paperwork, yes.**

6 Q. Looking at the order, page 1441, where
7 it says dental extraction, do you have any
8 knowledge who entered that order in the computer
9 system?

10 **A. Who entered the order? I do not know.**

11 Q. As a scheduler, do you have the ability
12 to enter scheduling orders that are signed by a
13 dentist at the jail?

14 **A. No.**

15 MS. MCELROY: Objection, form,
16 foundation, relevance.

17 BY THE WITNESS:

18 **A. No.**

19 BY MR. MORRISSEY:

20 Q. Do you know whether your supervisor has
21 the ability to enter a dental extraction order?

22 MS. MCELROY: Objection, form,
23 foundation. Answer if you know.
24

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1 BY THE WITNESS:

2 **A. I don't know.**

3 BY MR. MORRISSEY:

4 Q. Looking at page 1441, does this order
5 that has a date of 5/21/2018, and there's a name
6 of Brenda Taylor on it, does it indicate when a
7 dentist made this referral?

8 **A. Order details, May 21st, 2018.**

9 Q. So based on your review of this record,
10 the physician entered this order on May 21st,
11 2018?

12 MS. MCELROY: Objection, form,
13 foundation. Answer if you know.

14 BY THE WITNESS:

15 **A. According to that paper.**

16 BY MR. MORRISSEY:

17 Q. In looking at documents earlier, you
18 scheduled this patient in April of 2019 (sic) to
19 see the oral surgeon on May 21st, 2018, right?

20 **A. Correct.**

21 Q. So based on your knowledge and
22 experience, would there be some other referral
23 by a jail dentist relating to this patient being
24 referred to see an oral surgeon?

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1 **A. Another referral?**

2 Q. Would there be some other document?

3 MS. MCELROY: Objection, form,
4 foundation. Answer if you know.

5 BY THE WITNESS:

6 **A. I don't know.**

7 BY MR. MORRISSEY:

8 Q. To schedule a patient to be seen by the
9 oral surgeon from the jail, you are given a
10 referral by a jail dentist, right?

11 MS. MCELROY: Objection, form,
12 foundation. I believe she previously
13 testified that the order came through
14 Cerner. You can answer if you know.

15 BY THE WITNESS:

16 **A. Yes, the order came through Cerner.**

17 BY MR. MORRISSEY:

18 Q. Have you looked and seen any orders
19 from Cerner that initiated the scheduling
20 process for Keymon Ammons to be seen by an oral
21 surgeon?

22 MS. MCELROY: Objection, form,
23 foundation.

24 THE WITNESS: Can you repeat that?

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1 BY MR. MORRISSEY:

2 Q. If you were in your office and you had
3 access to your computer, in the Cerner system
4 for Keymon Ammons, would you be able to retrieve
5 the referral order for Keymon Ammons to be seen
6 by a Stroger oral surgeon?

7 MS. MCELROY: Objection, form,
8 foundation. You can answer if you know.

9 BY THE WITNESS:

10 **A. I don't know.**

11 BY MR. MORRISSEY:

12 Q. I want to refer you back to Exhibit 2,
13 page 1504.

14 MS. MCELROY: Would you like me to pull
15 it up on my screen for you?

16 THE WITNESS: Yes. Thank you.

17 BY MR. MORRISSEY:

18 Q. From looking at this page -- I'll
19 rephrase. In April of 2018 to schedule a
20 patient for oral surgery who's detained at the
21 Cook County Jail, was it necessary for the
22 patient to have a referral by a dentist?

23 MS. MCELROY: Asked and answered. You
24 can answer.

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1 BY THE WITNESS:

2 **A. Yes.**

3 BY MR. MORRISSEY:

4 Q. Today have you seen any referral that
5 caused this patient, Keymon Ammons, to be
6 scheduled for oral surgery?

7 MS. MCELROY: Objection, form,
8 foundation, relevance. You can answer.

9 BY THE WITNESS:

10 **A. Have I seen a referral?**

11 BY MR. MORRISSEY:

12 Q. Today have you been presented with the
13 referral that caused you to schedule this
14 patient for oral surgery on April 9, 2018?

15 **A. It says here dental extraction in the**
16 **order.**

17 Q. And that was the page -- that was the
18 order given to you by the dentist?

19 MS. MCELROY: Objection, form,
20 foundation. If you know, answer.

21 BY THE WITNESS:

22 **A. If I schedule the appointment, I'm**
23 **pretty sure there was a referral.**
24

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1 BY MR. MORRISSEY:

2 Q. Have you ever seen a referral by a
3 dentist at the jail indicating a date and time
4 when the patient should be seen by the oral
5 surgeon?

6 MS. MCELROY: Asked and answered.

7 BY THE WITNESS:

8 **A. No.**

9 BY MR. MORRISSEY:

10 Q. Did you see where the order says
11 request date and time, 5/21/18, 1330?

12 MS. MCELROY: Objection, form,
13 foundation, asked and answered.

14 BY MR. MORRISSEY:

15 Q. Do you see that?

16 **A. That's when the patient was seen,**
17 **May 21st, 2018.**

18 Q. And that's under the orders section?

19 **A. Yes.**

20 Q. And that's the date that you confirmed
21 the patient to be seen by the oral surgeon?

22 MS. MCELROY: Objection, form,
23 foundation, misstates her previous
24 testimony. You can answer if you know.

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1 BY THE WITNESS:

2 **A. I scheduled and confirmed April 9, and**
3 **the appointment was May 21st, 2018.**

4 BY MR. MORRISSEY:

5 Q. Before you scheduled that patient for
6 oral surgery on April 9, 2018, did he have an
7 upcoming appointment at the Stroger oral
8 surgery?

9 MS. MCELROY: Form, foundation. Answer
10 if you know.

11 BY THE WITNESS:

12 **A. I don't know.**

13 BY MR. MORRISSEY:

14 Q. Why to your knowledge under the order
15 dental extraction does it have a date and time
16 request?

17 MS. MCELROY: Objection, form,
18 foundation. Answer if you know.

19 BY THE WITNESS:

20 **A. I don't know.**

21 BY MR. MORRISSEY:

22 Q. Would you agree there would be some
23 other document indicating the dentist who
24 referred this patient for an appointment with

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1 the oral surgeon that initiated this process?

2 MS. MCELROY: Objection, form,
3 foundation. Answer if you know.

4 BY THE WITNESS:

5 **A. I don't know.**

6 BY MR. MORRISSEY:

7 Q. How would you look to investigate
8 whether there are some other documents relating
9 to this person being referred by a jail dentist
10 to see the oral surgeon?

11 MS. MCELROY: Objection, form,
12 foundation, asked and answered.

13 BY THE WITNESS:

14 **A. I don't know that information.**

15 BY MR. MORRISSEY:

16 Q. In April of 2018 when you schedule a
17 patient to be seen by the oral surgeon and the
18 person is in the jail, you would have a referral
19 by a dentist identifying the dentist, correct?

20 **A. Yes.**

21 Q. And there would be a date that the
22 dentist made the referral, correct?

23 **A. Yes.**

24 Q. And there would be a diagnosis on that

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1 form, correct?

2 **A. Correct.**

3 Q. As you sit here today, are you confused
4 at all about how inmates at the Cook County Jail
5 are referred and scheduled for oral surgery
6 appointments?

7 MS. MCELROY: Objection, form,
8 foundation, relevance. You can answer.

9 BY THE WITNESS:

10 **A. No.**

11 BY MR. MORRISSEY:

12 Q. Is there anything that would affect
13 your ability to remember and testify about how
14 inmates who are detained at the Cook County Jail
15 are scheduled to be seen by an oral surgeon over
16 the last 2 years?

17 MS. MCELROY: Objection, form,
18 foundation.

19 BY THE WITNESS:

20 **A. No.**

21 BY MR. MORRISSEY:

22 Q. Have you ever scheduled a patient to
23 have 4 wisdom teeth removed?

24 MS. MCELROY: Objection, asked and

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1 answered. You can answer if you know.

2 BY THE WITNESS:

3 **A. Have I ever had a patient? Yes.**

4 BY MR. MORRISSEY:

5 Q. Moving over to Exhibit 2, page 1508,
6 it's the scheduling record that was produced
7 last night relating to Ammons' February 6, 2019,
8 encounter with an oral surgeon.

9 MS. MCELROY: Ms. Macias, I have pulled
10 it up on my laptop computer. You can freely
11 navigate this page.

12 BY MR. MORRISSEY:

13 Q. From looking at this page, you would
14 agree that you scheduled and confirmed Ammons on
15 November 6, 2018, to see the oral surgeon on
16 February 6, 2019, right?

17 **A. Correct.**

18 Q. And prior to scheduling him on
19 November 6, 2018, you were provided with a
20 referral by Brenda Taylor, correct?

21 **A. Correct.**

22 Q. And the referral did not identify the
23 specific date and time for Ammons to see the
24 oral surgeon, correct?

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1 MS. MCELROY: Asked and answered. You
2 can answer.

3 BY THE WITNESS:

4 **A. No specific date, no.**

5 BY MR. MORRISSEY:

6 Q. And you selected a specific date based
7 on what the computer gave you, right?

8 MS. MCELROY: Asked and answered. You
9 can answer.

10 BY THE WITNESS:

11 **A. The system gave me a date -- gives me**
12 **the next available date.**

13 BY MR. MORRISSEY:

14 Q. The next available date the system gave
15 you was February 6, 2019, correct?

16 **A. Correct.**

17 Q. And the referral order that you
18 received by Brenda Taylor would have identified
19 a diagnosis, correct?

20 MS. MCELROY: Asked and answered.

21 BY THE WITNESS:

22 **A. It had to have a diagnosis.**
23
24

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1 BY MR. MORRISSEY:

2 Q. And you have not seen a referral order
3 today, correct?

4 MS. MCELROY: Asked and answered. You
5 can answer if you know.

6 BY THE WITNESS:

7 **A. I don't know.**

8 BY MR. MORRISSEY:

9 Q. Do you want to look through all the
10 records to identify whether you looked at a
11 referral order?

12 **A. Do I have to?**

13 MS. MCELROY: It's up to you.

14 BY MR. MORRISSEY:

15 Q. Did you see a referral order that was
16 transmitted to you before you scheduled Ammons
17 on November 6, 2018, for an oral surgery
18 appointment?

19 **A. If I schedule the appointment, I'm**
20 **pretty sure that there was an order.**

21 Q. Have I shown you that order today in
22 the deposition?

23 **A. I don't remember you showing me.**

24 Q. Why don't you look at the documents I

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1 have given you and why don't you tell me if you
2 see an order by Brenda Taylor for Ammons to see
3 the oral surgeon with a diagnosis?

4 MS. MCELROY: I'm just going to object
5 to foundation as far as Exhibit 2 --
6 actually, all of them except for 1, so 2, 3
7 and 4.

8 BY THE WITNESS:

9 **A. According to this paper, it has a**
10 **reason why patient needs to be seen.**

11 BY MR. MORRISSEY:

12 Q. You're looking at page 1173?

13 **A. Yes.**

14 Q. The reason he needs to be seen is
15 because he's in pain it says?

16 **A. Yes.**

17 Q. And that's dated September 6, 2018?

18 **A. Yes, September 6, 2018.**

19 Q. If you were at your office, would you
20 be able to access the Power orders for Ammons?

21 MS. MCELROY: Asked and answered. You
22 can answer.
23
24

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1 BY THE WITNESS:

2 **A. Yes, but I don't have to go in the**
3 **Power orders for inmates.**

4 BY MR. MORRISSEY:

5 Q. How would you access the referral by
6 the jail dentist relating to Ammons' February
7 2019 appointment?

8 MS. MCELROY: Asked and answered.

9 BY THE WITNESS:

10 **A. It's in the orders in Cerner.**

11 BY MR. MORRISSEY:

12 Q. And that order would be entered before
13 November 6, 2018, by the jail dentist?

14 **A. Yes.**

15 MS. MCELROY: Asked and answered.

16 MR. MORRISSEY: Nothing further.

17 MS. MCELROY: I just have a few more
18 questions.

19 FURTHER EXAMINATION.

20 BY MS. MCELROY:

21 Q. Ms. Macias, if I could direct your
22 attention to Ammons-County 1504 that we have
23 previously looked at, this page gives the orders
24 and action history tabs found in Cerner. Based

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1 on this document, can you tell me when you
2 scheduled Keymon Ammons for oral surgery?

3 **A. April 9, 2018.**

4 Q. When you receive an order in Cerner
5 from a dentist at Cermak Health Services at the
6 Cook County Jail to schedule a detainee for oral
7 surgery at Stroger, after you receive the order,
8 how soon do you schedule the detainee?

9 **A. The appointment is 10 to 12 weeks away.**

10 Q. When you receive the order, do you
11 process them the same day?

12 **A. Not all the time.**

13 Q. So when you receive an order, how long
14 does it take you to process the order for
15 referral for a detainee to be seen for oral
16 surgery at Stroger?

17 **A. No more than a week.**

18 MS. MCELROY: Okay. No further
19 questions.

20 MR. MORRISSEY: I have nothing further.
21 Thank you for your time.

22 MS. MCELROY: We will reserve.

23
24 AND FURTHER DEPONENT SAITH NOT...

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Date: 06/13/2011

From: Dr. R.Townsend, Chief of Dental Services

To: Dr. M. Puisis, Chief Operating Office, Dr. A. Hart, Chief Medical Officer

Re: CHS Dental Services FISCAL Year 2012 Budget Request

For the Year 2012, I anticipate need for change in key functions of the dental department by adding 2 essential provider positions to the CHS Dental Staff to provide specialty dental clinic services. My main focus is staffing, at this time I do not anticipate a need for extraordinary supplies, materials or equipment.

1. Oral and Maxillofacial Surgeon (Oral Surgeon)
2. Registered Dental Hygienist

The Chief of Dental Services has the responsibility of managing and maintaining the integrity of oral health care services provided at Cermak Health Services.(CHS) I have a staff of 6 dentists including myself that provide dental treatment for approximately 10,000 detainees at Cook County Department of Correction. (CCDOC) We have a responsibility to recognize, diagnose and properly treat disease of the oral cavity. Oral Surgeons and Dental Hygienist both play major roles in preventing, eliminating and or managing oral disease. A large number of our patients suffer with oral health conditions that are usually treated by these two dental professionals. Unfortunately CHS does not currently provide for these dental services. The addition of these positions would allow us to become fully staffed and enable the dental providers to give optimal oral healthcare along with continuity of care at CHS.

We are currently struggling with limited clinic time, and available dental provider staff. This prevents us as a team from being readily available to supply necessary dental treatment in house on a regular basis. Oral surgery patient's referred to Stroger Oral Surgery take anywhere from 2 to 3months to be treated. The prior

2007 Cook County budget layoffs eliminated these 2 essential provider positions. The detainees constantly suffer from the inability to be referred for treatment in **CHS** due to the loss of these specialty services.

An Oral Surgeon is a regional specialist surgeon treating the entire Craniomaxillofacial Complex: anatomical area of the mouth, jaw, face, skull as well as associated structures. The most common surgical procedures previously provided by oral surgeons at CHS are: Dentoalveolar surgery (surgical removal of impacted teeth, difficult tooth extractions, extractions of medically compromised patients, treatment of benign pathology (cysts, tumors, etc.): Biopsy's and Diagnosis of malignant pathology of the oral cavity: Diagnosis of hard and soft tissue trauma (jaw fracture, cheek bone fracture, nasal fractures, skull and eye socket fractures.

A Registered Dental Hygienist is a professional dental provider who provides oral hygiene treatment, education, instruction and non surgical periodontal treatment (perio probing, scaling, root planing, perio maintenance, and meds), especially to patients who suffer with systemic illnesses (HIV/AIDS, diabetics,) and pregnant women . Hygienists are also the only other professional provider who can provide oral health screenings/ assessments, and prioritize patient scheduling for treatment. A Dental Hygienist is somewhat similar to a Physician Assistant and certainly just as essential. Dental teams that utilizing hygienist are more effective and efficient.

Periodontal disease is a chronic inflammatory progressive degenerative condition that has been shown to be the leading cause of tooth loss in adults. It destroys the periodontium (tissues that support and anchor the teeth). This disease can be localized or generalized and found in stages moderate, or severe. It is not curable but can be controlled with proper oral hygiene and adequate professional oral health care. Continuity of care is absolutely necessary for treating Periodontal Disease. A general prophylaxis (cleaning) is not the proper treatment. Patients who suffer with this disease should receive what is called non-surgical periodontal therapy. Leading risk factors are people with irregular or **non-existing professional oral health care**; people who suffer with cancer; immune

compromised conditions such as HIV/AIDS, Diabetes; pregnant women; and girls/women who experience hormonal changes. It is infectious and people in the advanced stages of the disease can pass it on just by kissing. Unfortunately one or more of these risk factors are related to the health status of a great number of the detainee population at CCDOC, especially **non-existing professional oral healthcare**.

Women with gum disease are more likely to deliver pre-term low birth weight babies than women with healthy gums. People with gum disease are more likely to develop heart disease or have difficulty controlling blood sugar.

Before the 2007 budget cuts the Cermak Health Services Dental Department operated 2 specialty oral health care clinics. An Oral Surgery clinic where a full time Oral Surgeon provided treatment Monday – Friday and Oral Hygiene clinic where a full time Registered Dental Hygienist provided oral hygiene treatment/education/instruction and non-surgical periodontal therapy Monday – Friday

As Chief of Dental Services and a doctor of dentistry I am determined to lead this dental team where it needs to be. I have found that the necessity for these services at CHS has not changed and will not change. It is imperative that we provide for these **essential** services by adding these positions to the 2012 Dental Department budget. This will assist the dental team in meeting our goals for providing optimal oral health care and increase our productivity.

Salary:

1 Oral Surgeon Position	Grade - KD6	Hourly <u>\$79.20</u>	Annually <u>\$164,736.</u>
1 Dental Hygienist Position	Grade - 20	Hourly <u>\$31.31</u>	Annually <u>\$65,128.</u>

Note: Cook County R. R. Core Center Dental Clinic utilize Dental Hygienist

Dr. Ronald Townsend, CHS Chief of Dental Services

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MONTRELL CARR, et al.,)
 Plaintiffs,)

vs.) No. 17-cv-7135

SHERIFF OF COOK COUNTY)

AND COOK COUNTY,)

ILLINOIS,)

 Defendants.)

The deposition of JORELLE ALEXANDER, DMD, called for examination pursuant to the Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Mary Kay Andriopoulos, Certified Shorthand Reporter in the State of Illinois, via Zoom Videoconference on September 25, 2020, at the hour of 10:27 a.m.

REPORTED BY: MARY KAY ANDRIOPOULOS, CSR
LICENSE NO. 084-002248

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I N D E X

WITNESS

EXAMINATION

JORELLE ALEXANDER, DMD

BY MR. FLAXMAN

5

E X H I B I T S

NUMBER

MARKED FOR ID

JORELLE ALEXANDER, DMD

(Exhibit Nos. 1-24 previously marked by
counsel and attached)

(whereupon, the witness was duly
sworn.)

JORELLE ALEXANDER, DMD,
having been first duly sworn, was examined and
testified as follows:

EXAMINATION

BY MR. FLAXMAN:

Q. Could you state your name, and spell
your last name for us, please?

A. Jorelle Alexander, A-L-E-X-A-N-D-E-R.

Q. Are you employed by Cook County,
Illinois?

A. I'm employed by Cook County Health.

Q. And for how long have you been employed
by Cook County Health?

A. Since 2013.

Q. What's your present position?

A. Department Chair.

Q. Of what department?

A. Oral health.

Q. For how long have you been the
Department Chair of Oral Health?

A. I believe that was in 2015.

Q. What was your position before you



1 became the Department Chair of Oral Health?

2 A. The Systems Director of Oral Health.

3 Q. What's the difference between being
4 Systems Director of Oral Health and Department
5 Chair of Oral Health?

6 A. There is none.

7 (Whereupon, a discussion was had
8 off the record.)

9 BY MR. FLAXMAN:

10 Q. Okay. My question was could you tell
11 us the difference between being the Department
12 Chair of Oral Health and systems -- whatever it
13 was -- of oral health?

14 A. There is none.

15 Q. Thank you.

16 Do you have any of the exhibits that I
17 marked in front of you?

18 A. Yes.

19 Q. Good. Let me direct your attention to
20 Plaintiffs -- what's been previously marked as
21 Plaintiff's Exhibit Alexander Dep 01.

22 Have you ever seen that before?

23 A. Yes.

24 Q. Could you tell us what it is?



1 A. It appears to be a memo written by Dr.
2 Townsend.

3 Q. And do you know who Dr. Townsend is?

4 A. Yes.

5 Q. Was he the Chief of Dental Services at
6 Cook County Health on June 13th of 2011?

7 A. I was not here at that time, so I can't
8 confirm his position for 2011.

9 Q. When you started in 2013, was Mr.
10 Townsend employed by Cook County Health?

11 A. Yes.

12 Q. Do you recall what his position was?

13 A. Chief of Dental Services at Cermak.

14 Q. Okay. When's the first time you saw
15 Plaintiff's Exhibit Alexander Deposition 1, if
16 you recall?

17 A. I don't recall.

18 Q. Have you seen it before today?

19 A. Yes.

20 Q. Is it one -- did you gather this
21 deposition in response to this litigation --
22 excuse me.

23 Did you gather this exhibit in response
24 to this deposition?



1 MR. MCELROY: Objection to form.

2 BY MR. FLAXMAN:

3 Q. I'll rephrase it again.

4 Did you gather this exhibit as a result
5 of the initiation of this lawsuit?

6 A. No.

7 Q. Did you produce this -- well, let's go
8 back.

9 Am I correct that Exhibit Alexander
10 Deposition 1 relates to Dr. Townsend's lead or
11 -- his expression is there's a need for an oral
12 surgeon to work at the Cook County Jail?

13 MR. MCELROY: Objection to form and
14 foundation.

15 THE WITNESS: According to the memo --
16 (audio interruption) an oral surgeon and a
17 registered dental hygienist.

18 BY MR. FLAXMAN:

19 Q. Okay. And do you know if Cook County
20 Health ever hired an oral surgeon to work at the
21 Cook County Jail after June 13th of 2011?

22 MR. MCELROY: Objection to foundation.

23 THE WITNESS: There was not an oral
24 surgeon at the Cook County Jail when I came in



1 2013.

2 BY MR. FLAXMAN:

3 Q. Has there been an oral surgeon employed
4 at the Cook County Jail at any time after you
5 started to work for Cook County Health?

6 A. No.

7 Q. Did you -- were you involved in any
8 decision to not hire an oral surgeon to work at
9 the Cook County Jail?

10 MR. MCELROY: Objection to form.

11 THE WITNESS: I was involved in
12 conversations with Department of Justice who
13 stated that we did not have to have an oral
14 surgeon at Cook County Jail, that we were nearly
15 following the fact that that was something that
16 we had posted, so they were following through
17 with what we had originally posted.

18 Q. Could you answer -- well, did you
19 understand my question, ma'am?

20 A. I understood it. That's why I gave you
21 the answer which I gave.

22 Q. Did the Department of Justice tell Cook
23 County Health not to hire an oral surgeon to
24 work at the Cook County Jail?

1 MR. MCELROY: Objection to form,
2 foundation.

3 THE WITNESS: The Department of Justice
4 did not tell us not to hire one. The Department
5 of Justice said that we didn't have to have one.

6 BY MR. FLAXMAN:

7 Q. And who did they say that to, ma'am?

8 A. They said that at their -- one of their
9 visits when we were -- when they were there
10 doing the monitoring.

11 Q. Did the Department of Justice ever
12 communicate in writing that you reviewed stating
13 that Cook County Health does not have to hire an
14 oral surgeon to work at Cermak Hospital?

15 MR. MCELROY: Objection to form.

16 THE WITNESS: No, I believe that
17 communication in their report noted that there
18 was good collaboration and communication between
19 the Department of Oral Health and with oral
20 surgery, and that the wait times for oral
21 surgery were comparative to those that were in
22 the community.

23 Q. Could you read back my question,
24 please?



(whereupon, the record was read
as requested.)

BY MR. FLAXMAN:

Q. Could you answer that yes or no,
please, Dr. Alexander?

MR. MCELROY: Objection to the form of
the question, but you can answer to the extent
you can.

THE WITNESS: Again, I gave you the
answer in terms of what they communicated and
what was written.

BY MR. FLAXMAN:

Q. My question, Dr. Alexander, was not
what they did or why they did it or how they did
it.

My question was did the Department of
Justice ever communicate in writing to you that
it was not necessary for County Health Service
or Cook County or any of its subsidiaries to
hire an oral surgeon to work at the Cook County
Jail; that's a yes or no question, could you
answer it that way, please?

MR. MCELROY: Object to form.

THE WITNESS: No.



1 BY MR. FLAXMAN:

2 Q. Okay. And did anyone communicate --
3 from the Department of Justice communicate
4 orally to you stating that it was not necessary
5 for Cook County or any of its subsidiaries to
6 employ an oral surgeon to work at the Cook
7 County Jail?

8 A. Yes.

9 Q. And who made that communication?

10 A. Dr. Porsa.

11 Q. Can you tell us who Dr. Porsa is?

12 A. Dr. Porsa was the Department of Justice
13 monitor.

14 Q. And is he a dentist?

15 MR. MCELROY: Objection to foundation.

16 THE WITNESS: No.

17 BY MR. FLAXMAN:

18 Q. Okay. When did Dr. Porsa make this
19 statement that you heard?

20 A. I don't recall which monitoring visit
21 it was.

22 Q. Was it in 19 -- excuse me -- was it in
23 2015?

24 A. Again, I don't recall when he made the

1 statement.

2 Q. Was it in 2016?

3 A. Again, I do not recall when he made the
4 statement.

5 Q. Did you make any notes or records to
6 memorialize this statement from Dr. Porsa that
7 you related to us?

8 A. No.

9 Q. Did you hear my question?

10 A. I answered it. I answered your
11 question. I said no.

12 Q. Okay. And I didn't hear that. So I
13 apologize for the technology that we're dealing
14 with.

15 I'm not trying to harass you, but I
16 didn't hear it.

17 Do you know if anybody who works for
18 Cook County or any of its subsidiaries have any
19 written record to memorialize the statement by
20 Dr. Porsa that it was not necessary for an oral
21 surgeon to be employed at Cermak -- at the Cook
22 County Jail?

23 A. I would not be aware.

24 Q. So am I correct that because you're not

1 aware, you don't know if anybody else

2 memorialized that statement, is that correct?

3 A. That is correct.

4 Q. Okay. Do you have -- do you know what
5 data, if any, of which Dr. Porsa relied to make
6 the statement to you that Cook County did not
7 have to employ an oral surgeon at the Cook
8 County Jail?

9 A. Yes. There is a standard, a
10 correctional standard that states that the wait
11 times should not exceed those that are in the
12 community, and so he looked at the wait times
13 for the oral surgery versus the wait times in
14 the community, and often times our patients at
15 Cermak obtain -- (audio interruption) before
16 those in the community did.

17 Q. Now, you referred to a correctional
18 standard. Could you tell us what standard that
19 is?

20 A. I don't recall off the top of my head.
21 I would have to look. It's an NCCHC standard.

22 Q. Did you provide data to Dr. Porsa about
23 the wait times to see an oral surgeon for a
24 detainee at the Cook County Jail?



1 A. Yes.

2 Q. And in what format did you provide that
3 data?

4 A. In the oral health report for the
5 monitoring visit.

6 Q. Do you still have a copy of that oral
7 health report?

8 A. I'm not sure.

9 Q. Do you know when is the last time --
10 well, let me go back.

11 would you prepare an oral health report
12 in advance of each monitoring visit?

13 A. Each monitoring visit that I was
14 involved in, yes.

15 Q. And was the oral health report prepared
16 in the form of a paper report?

17 A. Yes.

18 Q. How many pages would each oral health
19 report be?

20 A. I don't recall.

21 Q. Would it be more than one?

22 A. Yes.

23 Q. And who was the -- who maintained
24 custody of those oral health reports?

1 A. I don't understand what you mean by who
2 maintained custody.

3 Q. Were you the final author on those oral
4 health reports?

5 A. What do you mean by final author?

6 Q. Were you the final person -- did you do
7 the last edits on those reports?

8 A. I don't recall.

9 Q. Who else -- well, were you involved in
10 preparing those reports?

11 A. There were various people involved in
12 preparing the reports.

13 Q. Were they maintained on a word -- were
14 they prepared on a word processing system?

15 A. What do you mean by word processing
16 system?

17 Q. Were they typed on a typewriter?

18 A. No.

19 Q. How were they prepared?

20 A. Some of it was written, some of it was
21 PowerPoint, and some of it was word.

22 Q. Were drafts of those oral health
23 reports circulated by e-mail?

24 A. No, I don't recall.



1 Q. well, were they circulated in computer
2 format or in paper format or in some other
3 format?

4 A. In paper format.

5 Q. Was there any spreadsheets -- well, how
6 were the PowerPoint presentations provided in
7 paper format?

8 A. They were printed, and the slides were
9 provided.

10 Q. Who else besides you was involved in
11 preparing those oral health reports?

12 A. I don't recall all of the people, and
13 it was various people at each time, so it would
14 depend.

15 Q. Well, could you tell us as best you can
16 the names of the people who were involved in
17 preparing any of those oral health reports?

18 A. Ronald Townsend.

19 Q. Anybody else?

20 A. That's all I can recall at this time.

21 Q. Have you conducted a search to see if
22 you have any of those oral health reports?

23 A. No.

24 Q. Have you ever been asked to conduct a



1 search to see if you have any of those oral
2 health reports?

3 A. I don't recall being asked.

4 Q. Do you recall ever being deposed in
5 litigation about dental care at the Cook County
6 Jail?

7 A. Yes.

8 Q. Have you been deposed more than once?

9 A. Yes.

10 Q. Have you ever testified in court about
11 oral healthcare at the Cook County Jail?

12 A. Yes.

13 Q. In any of those cases where you sat for
14 a deposition or testified in court, did you
15 review any of those oral health reports before
16 testifying?

17 A. Some of them were exhibits in those
18 cases.

19 Q. Could you give us the names of any of
20 those cases which the oral health reports were
21 exhibits?

22 A. I have no idea, Mr. Flaxman.

23 Q. Do you know the names of any of the
24 attorneys who represented either Cook County or



1 the plaintiffs in any of those cases in which
2 the oral health reports were produced?

3 A. Yourself and Morrissey.

4 Q. Anybody else?

5 A. No.

6 Q. Let me ask you to look at what's been
7 marked as Plaintiff's Exhibit Alexander
8 Deposition 02.

9 Have you ever seen that -- have you
10 ever seen this before?

11 A. Yes.

12 Q. Could you tell us what it is?

13 A. It is a job posting.

14 Q. And who posted the job?

15 A. Human resources.

16 Q. Was that the human resources of Cook
17 County government?

18 A. Cook County Health.

19 Q. And was that a job posting for the
20 position of oral surgeon to work at the Cook
21 County Jail?

22 A. Yes.

23 Q. Am I correct that this position that's
24 referred to in Exhibit 2 was never filled?

1 A. That is correct.

2 Q. All right. Let me ask you to look at
3 Exhibit 3. Could you tell us what Exhibit 3 is?

4 A. It appears to be an e-mail thread.

5 Q. Were you one of the recipients or
6 senders in this e-mail thread?

7 A. I appeared to be a recipient.

8 Q. Okay. The first e-mail seems to be
9 from Gladys Lopez, G-L-A-D-Y-S, Lopez. Who is
10 Gladys Lopez in May of 2013?

11 A. She was the Director of HR.

12 Q. And HR is -- what does HR mean?

13 A. Human resources.

14 Q. And do you remember getting this e-mail
15 from Ms. Lopez back in May of 2013?

16 A. I don't remember getting this e-mail,
17 no.

18 Q. Did you find this e-mail in the course
19 of responding to this lawsuit?

20 A. No.

21 Q. Okay. The e-mail refers to the fourth
22 time this oral surgeon position has been posted
23 in Taleo, T-A-L-E-O. Do you see that?

24 A. Yes.



1 Q. Could you tell us what Taleo is?

2 A. It's Taleo, and Taleo is the venue in
3 which job postings appear for applicants to
4 apply for county positions for Cook County
5 Health.

6 Q. Okay. And two lines down there's the
7 question, for example, comma, is there a need
8 for a full-time oral surgeon, question mark; do
9 you see that?

10 A. Yes.

11 Q. Did you respond to that question?

12 A. I don't recall.

13 Q. Well, am I correct that back in May of
14 2013 you believed that there was a need for a
15 full-time oral surgeon to work at the Cook
16 County Jail?

17 MR. MCELROY: Objection to form,
18 mischaracterizes previous testimony.

19 You can answer.

20 THE WITNESS: I cannot state that.

21 BY MR. FLAXMAN:

22 Q. Well, did you not believe there was a
23 need for a full-time oral surgeon to work at the
24 Cook County Jail in May of 2013?



1 A. I can't state that I even formulated an
2 opinion by May of 2013 rather than just
3 following through what someone else had already
4 started.

5 Q. In that e-mail there's a statement I am
6 sure you know who Manny is. Who is Manny?

7 A. Manny Estrada, he was the Chief
8 Operating Officer at Cermak Health Services.

9 Q. Did you ever respond to this e-mail?

10 MR. MCELROY: Asked and answered.

11 THE WITNESS: Again, I do not recall.

12 BY MR. FLAXMAN:

13 Q. Okay. Let me ask you to look at
14 Deposition Exhibit No. 4. Could you tell us
15 what that is?

16 A. It appears to be an e-mail thread
17 again. For this one I'm the author.

18 Q. So does that mean that you initiated
19 this e-mail thread?

20 A. Well, I cannot say that I initiated it,
21 because I can't tell whether or not something
22 appeared before, because the e-mail starts
23 halfway down the page as if something was at the
24 top that has been redacted, so I cannot say that



1 I started this e-mail.

2 Q. What did the notation on the e-mail or
3 in the document where it says from, colon,
4 Alexander, comma, Jorelle; does that mean that
5 you wrote that e-mail?

6 A. That does mean that I wrote that
7 e-mail, but the subject says RE, which would
8 indicate that there are previous e-mails in
9 regard to this, so, therefore, I was responding,
10 and not necessarily the initiator.

11 Q. What was the subject of that e-mail?

12 A. The subject line states RE; Cermak
13 RTA's oral surgeon PID 1200085.

14 Q. Could you tell us what RTH means,
15 please?

16 A. Request to hire.

17 Q. And PID 1200085, could you tell us what
18 that means, if you know?

19 A. That's a position identification
20 number.

21 Q. Okay. Did you write in this e-mail
22 chain that you did not believe it was necessary
23 to fill the oral surgeon position 1200085?

24 A. The e-mail chain doesn't reference



1 whether or not I thought it should be filled.

2 The e-mail chain asked me to respond to
3 something, and I responded to what -- (audio
4 interruption).

5 Q. Back in June of 2014 did you believe
6 that it was necessary to fill the oral surgeon
7 position PID 1200085?

8 A. Again, I cannot state that I felt that
9 it was necessary to fill that position, rather
10 than me just following through with something
11 that had already been started.

12 Q. So are you telling us that you had no
13 opinion whatsoever about whether it was
14 necessary to fill that vacant oral surgeon
15 position?

16 MR. MCELROY: Objection to form,
17 mischaracterizes previous testimony.

18 THE WITNESS: Again, what I'm stating
19 is, is that in 2014, and now in 2020, I cannot
20 say that in 2014 that I believe that we needed
21 to have an oral surgeon based -- an oral surgeon
22 based upon the fact that I was following through
23 on something that had already been started.

24 Q. Well, let me ask you to look at



1 Deposition Exhibit No. 5. Could you tell us
2 what that is, please?

3 A. It appears to be a description of
4 duties for an oral surgeon.

5 Q. On the right-hand column there are two
6 boxes that begin comment, bracket, AJ1 and AJ2;
7 do you see those?

8 A. Yes.

9 Q. Is AJ you?

10 A. I don't recall. It could be me.

11 Q. Well, when you use -- when you include
12 comments on documents, do the comments begin
13 with comment, bracket, AJ and then a number?

14 A. I don't know. I don't pay attention to
15 that.

16 Q. Okay. Do you recall the comments on
17 the oral surgeon job description that's in
18 Exhibit 5?

19 A. Only because the e-mail said that I
20 did.

21 Q. Okay. Is one of the comments -- could
22 you tell us what the first comment was that
23 appears on Exhibit 5?

24 A. This is not a procedure that would be



1 performed at Cermak, nor do we have the
2 equipment for said procedure.

3 Q. And what procedure were you referring
4 to when you said this is not a procedure that
5 would be performed at Cermak?

6 A. Again -- so again, I'm not stating that
7 AJ is me, because I don't know for certain that
8 it is.

9 There are lots of people in this
10 organization that have those initials, however,
11 it's in reference to performing minor cosmetic
12 procedures such as chin and cheekbone
13 enhancements and minor facial rejuvenation
14 procedures including the use of Botox and laser
15 technology.

16 Q. And is that something that was not
17 performed for detainees at the Cook County Jail?

18 A. That is correct.

19 Q. Okay. Do you know anybody else with
20 the initials AJ who was involved in reviewing
21 the oral surgeon job description back in 2015 --
22 or 2014?

23 A. I would not know all of the people that
24 could be -- could have been in HR that could



1 have reviewed it, both HR locally and HR
2 downtown, so I can't answer that.

3 Q. Well, is it your understanding or is it
4 your testimony that the comment; this is not a
5 procedure that would be performed at Cermak, nor
6 do we have the equipment for said procedure, is
7 the type of comment that could come from
8 somebody in human relations or human resources?

9 MR. MCELROY: Objection to form,
10 foundation.

11 You can answer.

12 THE WITNESS: Again, I don't know what
13 comments people can make in regards to what
14 knowledge they have about procedures and what
15 happens at Cermak.

16 All I'm stating here is that I cannot
17 be assured 100 percent that these were my
18 comments, I do not recall, and that AJ1 and AJ2
19 is me, that's what I'm testifying to.

20 Q. Okay. Do you know anybody else with
21 the initials AJ who back in 2014 knew whether or
22 not there was the equipment to perform laser
23 rejuvenation procedures for detainees at the
24 Cook County Jail?



1 A. No, I do not know of all the people
2 that have those initials.

3 Q. What's the second comment that you
4 wrote?

5 A. Again --

6 MS. MCELROY: Objection to form.

7 THE WITNESS: -- you're saying the
8 second comment that I wrote. I'm not testifying
9 to the fact that I wrote that comment, because I
10 do not recall writing the comment, and cannot
11 confirm that will AJ2 is me. The second --

12 Q. Let me rephrase the question.

13 Could you tell us what the procedure is
14 that's referred to in the comment written by
15 someone whose initials -- well, who's referred
16 to in the comment as AJ?

17 A. It says treat snoring problems using
18 laser surgery.

19 Q. And is that a procedure that would be
20 performed at Cermak for pre-trial detainees?

21 A. No.

22 Q. Do you know anybody else with the
23 initials AJ who in 2014 knew that?

24 MR. MCELROY: Objection to form and



1 foundation.

2 THE WITNESS: Again, as I stated, I'm
3 not aware of all of the people that were
4 involved, so I cannot speak to what their
5 initials were.

6 BY MR. FLAXMAN:

7 Q. Back in 2014 would the job of an oral
8 surgeon working at Cermak or working at the Cook
9 County Jail include performing surgery on the
10 mouth and jaws in order to treat conditions such
11 as cleft lip and palate and jaw growth problems?

12 MR. MCELROY: Objection to form.

13 You can answer.

14 THE WITNESS: Where are you reading
15 that from?

16 BY MR. FLAXMAN:

17 Q. The third bullet point.

18 A. It would have depended.

19 Q. Okay. Would the job of an oral surgeon
20 at Cermak Hospital back in 2014 have included
21 evaluating the position of the wisdom teeth in
22 order to determine whether problems exist
23 currently or might occur in the future?

24 A. It would depend.



1 Q. what would it depend on?

2 A. In terms of whether or not somebody was
3 complaining of pain or if there was some kind of
4 infection surrounding a wisdom tooth.

5 Q. Is evaluating the position of the
6 wisdom teeth something that an oral surgeon is
7 better qualified to perform than a general
8 dentist?

9 A. No.

10 Q. Is a general surgeon better qualified
11 to perform removing impacted, damaged and
12 non-restorable teeth than a general dentist?

13 A. You asked me if a general surgeon was.

14 Q. I'm sorry. What I meant to say is an
15 oral surgeon better qualified to remove
16 impacted, damaged and non-restorable teeth than
17 a general dentist?

18 A. Not necessarily.

19 Q. Is an oral surgeon better qualified
20 than a general dentist to treat infections of
21 the oral cavity, salivary glands, jaws and neck?

22 A. Not necessarily.

23 Q. Okay. Let me ask you to look at
24 Exhibit 6. Could you tell us what this is,



1 please?

2 A. It appears to be -- it's labeled as a
3 functional job description.

4 Q. Were you involved in the preparation of
5 Exhibit 6?

6 A. I do not recall.

7 Q. Do you know the date that Exhibit 6 was
8 prepared?

9 A. No, I do not.

10 Q. Let me ask you to look at Exhibit 7.
11 Can you tell us what that one-page document is,
12 please?

13 A. It's an e-mail that I authored and sent
14 to Ronald Townsend.

15 Q. Did you send it on March 19th, 2015 at
16 1:21 p.m.?

17 A. That's what it says.

18 Q. Well, is that when you sent it?

19 A. Well, I can only go by what it says
20 here. I don't recall when it was sent.

21 Q. Well, is it possible it was sent on
22 March 19th of 2017?

23 MS. MCELROY: Objection to form.

24 THE WITNESS: well, if somebody



1 doctored it, it could be.

2 BY MR. FLAXMAN:

3 Q. Do you have a recollection of sending
4 an e-mail to Dr. Townsend on March 19, 2015
5 about a potential oral surgeon candidate?

6 A. I recall sending an e-mail to him. I
7 don't recall the exact date or time.

8 Q. Okay. Was it in 2015?

9 A. I do not recall the exact date or time.

10 Q. Do you recall an oral -- a candidate
11 for the oral surgeon position coming to visit
12 the facilities at the Cook County Jail in 2015?

13 A. I recall a candidate coming to visit.
14 Again, I don't recall when.

15 Q. Well, do you send -- do you send --
16 back in 2015, did you send e-mails about
17 potential oral surgeon candidates in the regular
18 course of your business at Cook County Health?

19 MR. MCELROY: Objection to form.

20 THE WITNESS: Again, I don't recall
21 what e-mails I sent back in 2015.

22 BY MR. FLAXMAN:

23 Q. That wasn't my question.

24 would you send e-mail communications in



1 the regular course of your work for Cook County
2 Health back in 2015?

3 A. Okay. So you initially asked me about
4 sending e-mails related to oral surgery, and I
5 answered, and I said I do not recall.

6 Yes, in 2015 I sent e-mails in the
7 regular course of business.

8 I cannot say that I sent e-mails in
9 regards to oral surgery in the regular course of
10 business.

11 Q. So as you sit here now, am I correct
12 that you do not recall having sent an e-mail to
13 Dr. Townsend in March of 2015 about a potential
14 candidate for the oral surgeon position?

15 A. Again, I recall sending him an e-mail.
16 I don't recall when, but do I recall sending him
17 an e-mail about a potential oral surgeon
18 candidate.

19 Q. Let me ask you to look at Exhibit 8.
20 Am I correct that Exhibit 8 is a four-page
21 document?

22 A. Yes.

23 Q. Does it start with an e-mail that
24 states it's from Alexander, comma, Jorelle?



1 A. Yes.

2 Q. Do you know anybody who worked for Cook
3 County Health in 2015 whose name was Alexander
4 Jorelle -- or Jorelle Alexander -- excuse me?

5 A. No.

6 Q. Okay. Do you recall sending this
7 e-mail to Margaret Kryda, K-R-Y-D-A, on
8 March 24th, 2015 at 8:43 a.m.?

9 A. I don't recall sending it, but I see
10 it.

11 Q. Do you recall a request to hire an oral
12 surgeon to work at the Cook County Jail under
13 PID 1200085 back in 2015?

14 A. I recall a request to hire. I can't
15 tell you when that was.

16 Q. Can you tell us who Margaret Kryda is
17 or was?

18 A. She was -- I believe her title was
19 administrative analyst.

20 Q. And for whom did she work?

21 A. Dr. Claudia Fegan.

22 Q. Did she work for Cook County Health?

23 A. Yes.

24 Q. And who is Dr. Fegan?



1 A. Her boss.

2 Q. What was Dr Fegan's position?

3 A. Chief Medical Officer.

4 Q. Do you recall asking Margaret Kryda to
5 assist you in getting a job posting for the oral
6 surgeon position back in March of 2015?

7 A. Only because of the e-mails that are
8 sitting here.

9 Q. Well, back in March of 2015, did you
10 believe that a vacant oral surgery position at
11 the Cook County Jail should be filled?

12 A. I believe that I wasn't following
13 through because of something that was already
14 started.

15 Q. And did you have any recollection of
16 why it was that you -- I'll rephrase that.

17 Let me ask you to look at Page 2 of
18 this exhibit.

19 Do you recall an e-mail that you sent
20 to Margaret Kryda on February 4th, 2015 about
21 the request to hire an oral surgeon to work at
22 Cermak?

23 A. Only what is written here. Other than
24 that, I do not recall.



1 Q. Okay. Do you recall ever asking anyone
2 in 2015 to get the job posted as soon as
3 possible for the then-vacant oral surgeon
4 position at the Cook County Jail in 2015?

5 A. I do not recall.

6 Q. All right. Did you believe in
7 February 2015 that it was necessary to fill the
8 vacant oral surgeon position at the Cook County
9 Jail?

10 A. Again, as I stated, I can't say that I
11 believe we needed to fill that in 2015, but was
12 merely following through on something that had
13 already been started.

14 Q. Did you ever complete any budget
15 documents for staff, personnel staffing at
16 Cermak Hospital?

17 A. I don't recall.

18 Q. Do you recall ever being involved in
19 preparation of the budget documents?

20 A. I don't recall.

21 Q. Do you know whether or not budget
22 documents are submitted to Cook County to fund
23 the operation at Cermak Hospital each year?

24 A. There are documents that are submitted.



1 Q. Have you ever been involved in the
2 preparation of any of those documents?

3 A. I don't recall being involved in the
4 preparation.

5 Q. Did you ever review any of the
6 documents that were submitted for the budget for
7 dental services at the Cook County Jail?

8 A. I don't recall.

9 Q. Do you know who was involved in
10 preparation of the budget documents for dental
11 services at the Cook County Jail back in 2015?

12 A. Ronald Townsend.

13 Q. And Dr. Townsend stopped working at the
14 jail at some point, is that right?

15 A. That is correct.

16 Q. And at some point Dr. Townsend reported
17 to you, is that correct?

18 A. That is correct.

19 Q. And when he was reporting to you, can
20 you tell us when it was that Townsend reported
21 to you?

22 A. Townsend began reporting to me in 2013.

23 Q. And do you know if he prepared any
24 budget documents after 2013?



1 A. I'm not sure of him preparing any
2 documents.

3 He may have been asked in terms of the
4 staffing that we had, but outside of that, that
5 probably was his only involvement, but I
6 wouldn't be certain.

7 Q. Did you ever review any budget
8 documents that Dr. Townsend prepared at any time
9 after 2013?

10 A. I don't recall.

11 Q. Do you ever recall reviewing any budget
12 documents which stated that we need funding for
13 a vacant oral surgery position at the Cook
14 County Jail?

15 A. I don't recall.

16 Q. Is there anything you could look at
17 that would refresh your recollection?

18 A. No.

19 Q. Well, if you looked at the actual
20 budget that was approved by Cook County which
21 authorized an oral surgeon position at the Cook
22 County Jail, would that refresh your
23 recollection?

24 MR. MCELROY: Objection to form, calls



1 for speculation.

2 THE WITNESS: No.

3 BY MR. FLAXMAN:

4 Q. Okay. Do you keep -- well, if you go
5 back to Deposition Exhibit No. 8, if you look at
6 Page 3, at the bottom, is there another e-mail
7 that appears to be written by you?

8 A. Yes.

9 Q. And what's the date on that?

10 A. June 26, 2014.

11 Q. Do you have any recollection of having
12 sent that e-mail?

13 A. It looks familiar.

14 Q. Well, do you recall sending the e-mail
15 that's at the bottom of Page 3 of Deposition
16 Exhibit No. 8 to Sandy Hardesty and Geri,
17 G-E-R-I, Evans on June 26, 2014 at 11:22 a.m.?

18 A. No, I don't recall sending it.

19 Q. Okay. Do you recall making revisions
20 to a job description highlighting two items that
21 would not be applicable to the practice of oral
22 surgery at Cermak?

23 A. According to the e-mail, that's what I
24 wrote.



1 Q. Do you recall writing that?

2 A. I don't recall the e-mail that I wrote
3 six years ago.

4 It looks familiar, but I don't remember
5 it.

6 Q. Do you have any reason to believe that
7 this e-mail that appears at the bottom of Page 3
8 of Deposition Exhibit No. 8 is incorrect -- or
9 let me -- let me -- what I meant was do you have
10 any reason to believe that the e-mail that's at
11 the bottom of Deposition Exhibit No. 8, Page 3
12 is not what it appears to be?

13 MR. MCELROY: Objection to form.

14 THE WITNESS: No.

15 BY MR. FLAXMAN:

16 Q. And if you look at Page 4, there's a
17 reference to reposting of the oral surgeon
18 position; do you see that?

19 A. Yes.

20 Q. Do you recall a problem with the oral
21 surgeon's position having been posted at too low
22 a salary?

23 A. Yes.

24 Q. Do you know why that was?



1 MR. MCELROY: Object to form.

2 THE WITNESS: why what was?

3 BY MR. FLAXMAN:

4 Q. why the oral surgeon position was
5 posted at too low a salary.

6 MR. MCELROY: Objection to form,
7 foundation.

8 THE WITNESS: No.

9 BY MR. FLAXMAN:

10 Q. And am I correct the position was
11 reposted at a higher salary?

12 A. Yes.

13 Q. Do you know why that was?

14 MR. MCELROY: Objection, form and
15 foundation.

16 THE WITNESS: I do remember sending an
17 e-mail in regards to the fact that the hourly
18 rate that was initially offered was that would
19 not attract an oral surgeon.

20 BY MR. FLAXMAN:

21 Q. And how did you make -- reach that
22 conclusion?

23 A. Because it was lower than what a
24 general dentist would make.

1 Q. Let me ask you to look at Deposition
2 Exhibit No. 9, at the bottom of page -- could
3 you tell us what this is, what this appears to
4 be?

5 A. An e-mail thread.

6 Q. Does the bottom of Page 1 include your
7 e-mail or an e-mail from Alexander, comma,
8 Jorelle dated March 19, 2015 at 1:21 p.m.?

9 A. Yes.

10 Q. And do you remember writing this
11 e-mail?

12 A. Yes.

13 Q. why did you write it?

14 A. It stated here I had a potential
15 candidate for the oral surgeon position, and he
16 would like to come see the facility, and I
17 needed to clear it.

18 Q. was that potential candidate hired?

19 A. No.

20 Q. why not?

21 A. There were issues in regards to his
22 ability to meet credentials.

23 Q. was he ever offered a position?

24 A. I do not recall.

1 Q. Do you remember his name?

2 A. Yes.

3 Q. What was his name?

4 A. Paul Stec.

5 Q. Could you spell that for us please?

6 A. S-T-E-C.

7 Q. Had you known Mr. Stec before he
8 applied to work at Cermak?

9 A. Yes.

10 Q. How long had you known Mr. Stec?

11 A. I knew him since 2007.

12 Q. How did you have occasion to meet him?

13 A. He was an oral surgery attending at
14 Rush.

15 Q. Okay. Did you tell Mr. Stec about the
16 opening at Cermak?

17 A. I don't recall.

18 Q. Okay. Did you know he was applying
19 before he actually applied -- let me withdraw
20 that question.

21 Did you do anything to encourage Mr.
22 Stec to apply for the vacant position at Cermak?

23 A. No.

24 Q. Okay. When you wrote -- when you wrote



1 the e-mail to Dr. Townsend about Dr. Stec being
2 a potential candidate, do you believe that the
3 vacant position of oral surgeon should be
4 filled?

5 A. Again, I cannot state that I believe
6 that it should be filled, but merely was
7 following through on what had already been --
8 (audio interruption).

9 Q. And were you just following orders from
10 someone?

11 A. No. That was something that had
12 already started prior to me getting here, and it
13 had not gotten any movement.

14 Q. Well, did you change things after you
15 started to work at Cook County Health?

16 MR. MCELROY: Objection to form.

17 THE WITNESS: Yes.

18 BY MR. FLAXMAN:

19 Q. Did you change anything that happened
20 in the way dental services were provided at
21 Cermak after you started to work for Cook County
22 Health?

23 A. Yes.

24 Q. And could you have changed the desire



1 to fill the vacant oral surgeon position after
2 you started working for Cook County Health?

3 A. If there was not a need for it. I
4 alone couldn't have made the change, but I
5 certainly could have recommended that that was
6 not -- it was not necessary.

7 Q. When, if at all, did you recommend that
8 it was not necessary to fill the vacant oral
9 surgeon position?

10 A. I don't recall.

11 Q. Was it in 2015?

12 A. Again, I don't recall.

13 Q. Okay. Did you -- do you recall
14 recommending that the position of oral surgeon
15 not be filled?

16 A. I recall providing the data that showed
17 we were meeting the NCCAC standard in terms of
18 the wait times, and so I do recall providing
19 that data and that information. That's what I
20 recall.

21 Q. Do you have any recollection of ever
22 making a written recommendation that the oral
23 surgeon position not be filled?

24 A. I don't recall.



1 Q. Okay. Is there anything you could look
2 at that would refresh your recollection?

3 A. No.

4 Q. Let's look at Exhibit 9. I think we
5 just looked at Exhibit 9.

6 Let's look at Exhibit 10. Could you
7 tell us what this appears to be, please?

8 A. An e-mail.

9 Q. And is the first -- am I correct that
10 there are two e-mails on this exhibit?

11 A. There are.

12 Q. Is the earliest e-mail and time at the
13 bottom of Page 1 of Deposition Exhibit No. 9?

14 A. Can you repeat your question?

15 Q. Let me rephrase the question.

16 Does this e-mail contain what appears
17 to be a response from Dr. Townsend to your
18 e-mail of March 19, what appears to be your
19 e-mail of March 19, 2015 about a potential
20 candidate for the oral surgeon position?

21 A. Mr. Flaxman, you have me looking at
22 Deposition 10, which has two e-mails on it,
23 which have nothing to do with Townsend.

24 Q. I'm looking at the wrong exhibit.



1 Thank you for correcting me. I apologize, and
2 I'll start over.

3 Exhibit -- Exhibit 10 begins with your
4 e-mail that has your name on it dated
5 September 2nd, 2015, is that right?

6 A. Yes.

7 Q. And it appears to be a response to an
8 e-mail from Sandy Hardesty, H-A-R-D-E-S-T-Y; is
9 that fair?

10 A. Yes, that is correct.

11 Q. Who is Sandy Hardesty?

12 A. I don't recall her title, but she's
13 finance for Cermak.

14 Q. At the bottom of Page 1 of Exhibit 10
15 -- if you need to take a break, tell us that,
16 and we'll take a break.

17 Okay. At the bottom of Page 10, is
18 there another e-mail that you wrote on
19 September 2nd of 2015?

20 A. Yes.

21 Q. And I see where it says can you please
22 forward me the RTH for the oral surgeon; do you
23 see that?

24 A. Yes.



1 Q. Is the RTH the request to hire?

2 A. Yes.

3 Q. Did you write this because you were
4 ready to submit the paperwork to hire Dr. Stec?

5 A. I believe so. I don't recall, though.

6 Q. Okay. And the e-mail above that, do
7 you recall getting an e-mail from Sandy Hardesty
8 about the signatures on the request to hire?

9 A. That's what the e-mail says.

10 Q. Let me ask you to look at Deposition
11 Exhibit No. 11, which is the same as No. 10, so
12 let's go to No. 12.

13 Could you tell us what Exhibit 12 is?

14 A. Exhibit 12 is a request to hire, and a
15 Cook County Shakman Form.

16 Q. And are you listed -- have you ever
17 seen this before?

18 A. I don't recall.

19 Have I ever seen this request to hire
20 or are you asking have I ever seen the form?

21 Q. Well, have you ever seen this
22 particular form, Exhibit -- Deposition Exhibit
23 No. 12?

24 A. Well, there's two forms in Deposition



1 No. 12.

2 Are you asking me just general about
3 the form or a specific --

4 Q. Let's look at Page 1 of Deposition
5 Exhibit No. 12.

6 It says -- it's entitled Cook -- at the
7 top it says Cook County Health and Hospital
8 system; do you see that?

9 A. Yes.

10 Q. And then there's an X next to Cermak;
11 do you see that?

12 A. Yes.

13 Q. Is Cermak -- what doe Cermak refer to,
14 if you know?

15 A. Cermak Health Services located at Cook
16 County Jail.

17 Q. Okay. And there's a date on this
18 document. Could you read that to us, please?

19 A. September 2nd, 2015.

20 Q. That's the same date as the e-mails we
21 were just looking at, is that correct?

22 A. Yes.

23 Q. Okay. Then we go further down, we see
24 PID No. 1200085; do you see that?



1 A. Yes.

2 Q. Okay. Have you ever seen this form,
3 this request to hire for 1200085 that's dated
4 September 2nd, 2015?

5 A. I don't recall.

6 Q. Okay. Let's look at Page 2 of Exhibit
7 12. Could you tell us what this form is?

8 A. This is the Cook County Shakman
9 Certification Form.

10 Q. What is Page 3?

11 A. The second page of that same form.

12 Q. Okay. Let's look at Exhibit 13. All
13 right. Could you tell us, is this a two-page
14 document?

15 A. Yes.

16 Q. Am I correct that there is one e-mail
17 printed on these two pages?

18 A. That is correct.

19 Q. Okay. Is this an e-mail written by
20 someone named Alexander, comma, Jorelle?

21 A. Yes.

22 Q. Is that you?

23 A. That is me.

24 Q. Did you write there to George Panos,



1 P-A-N-O-S?

2 A. According to this, yes.

3 Q. Could you tell us who George Panos is?

4 A. He's an oral surgeon at Stroger.

5 Q. Okay. Do you remember writing this
6 e-mail?

7 A. I don't recall, but clearly, I did.

8 Q. Okay. Did you put in those nine or so
9 exclamation marks on the first sentence of the
10 letter?

11 A. Yes.

12 Q. And the second sentence refers to
13 something called OMFS. Could you tell us what
14 that is?

15 A. Oral maxillofacial surgery.

16 Q. Is that a department or at Stroger
17 Hospital?

18 A. Yes.

19 Q. Could you read the next sentence to us,
20 please?

21 A. As we spoke yesterday, we are in
22 desperate need for a part-time oral surgeon at
23 Cermak.

24 Q. And could you tell us why you wrote



1 that?

2 A. Again, because this was something that
3 they had started back in 2011, 2012 that had not
4 moved.

5 Q. When you wrote we are in desperate
6 need, what did you mean by that?

7 A. Because we -- the position had moved,
8 and I'm not certain as to where or who said that
9 we ever needed the position or where the
10 information was initially obtained, but again,
11 this was something that had not moved from the
12 time that it was started until 2016, and so
13 that's what I meant by desperate.

14 Q. When I -- did you -- do you type your
15 own e-mails?

16 A. Yes.

17 Q. And when you typed the word desperate,
18 did you use all capital letters?

19 A. I did.

20 Q. Did you do that to emphasize your use
21 of that word?

22 A. Yes.

23 Q. Okay. And then after the sentence with
24 desperate, the sentence after that you wrote I



1 am willing to explore any and all opportunities;
2 do you see that?

3 A. Before that there's another sentence in
4 between there.

5 Q. Could you read that to us, please?

6 A. I don't know if anyone is interested or
7 if there would be an opportunity to do a mini
8 clinic at Cermak with an attending and residents
9 once a week. I'm willing to explore any and all
10 opportunities.

11 Q. And could you tell us why you were
12 willing to explore any and all opportunities?

13 A. Because there were patients that would
14 still need to go to Stroger, and having an oral
15 surgeon at Cermak, it would have to be some kind
16 of -- an oral surgeon at Cermak would not cancel
17 the need for oral surgery at Stroger, which is
18 why I reference it to be a mini clinic.

19 Q. Could you tell what you say a mini
20 clinic is or what you meant by that?

21 A. A mini clinic meaning that it could be
22 some kind of -- some kind of presence at Cermak.

23 Q. And when you wrote attending, what does
24 attending mean?



1 A. An attending is someone who is already
2 an oral surgeon.

3 Q. And what's a resident?

4 A. A resident is somebody that's in
5 training.

6 Q. Did Cermak have a facilities for an
7 oral surgeon to perform oral surgery back in
8 April of 2016 at Cermak?

9 A. I don't understand what you mean by
10 facilities.

11 Q. Well, does an oral surgeon need a
12 different kind of facilities than a general
13 dentist?

14 A. It depends.

15 Q. Well, does an oral surgeon require the
16 use of a panoramic x-ray machine?

17 A. Sometimes yes. Sometimes no.

18 Q. Did Cermak have a panoramic x-ray
19 machine back in April of 2016?

20 A. I believe they had one, but it was no
21 longer working.

22 Q. Well, did Cermak ever get a working
23 panoramic x-ray machine?

24 A. No.



1 Q. Okay. Did you think -- ever think --
2 ever recommend that Cermak get a working
3 panoramic x-ray machine?

4 A. I believe I did.

5 Q. And did you recommend that Cermak get a
6 panoramic x-ray machine, because it would be
7 needed by an oral surgeon working at Cermak?

8 A. My recommendation related to a
9 panoramic x-ray machine again would be case
10 dependant upon what needed to happen, and
11 dependant upon what treatment needed to be
12 provided, a panoramic x-ray would be necessary.

13 Q. After the sentence I am willing to
14 explore any and all opportunities, could you
15 read to us what you wrote next?

16 A. We can certainly look at a way to
17 triage the cases that would still need to go to
18 Stroger versus those that could be done at
19 Cermak by an oral surgeon, but we refer quite a
20 few monthly and transportation of inmates has
21 been and will continue to be a challenge.

22 Q. Could you read it slower for the
23 reporter?

24 A. We can certainly look at a way to



1 triage the cases that would still need to go to
2 Stroger versus those that could be done at
3 Cermak by an oral surgeon, but we refer quite a
4 few monthly, and transportation of inmates have
5 been and will continue to be a challenge.

6 Q. When you wrote, quote, a few monthly,
7 what did you mean?

8 A. That there were a number of patients
9 that are referred every month to oral surgery at
10 Stroger.

11 Q. Do you know what that number is or was?

12 A. I don't recall.

13 Q. Did you ever have a compilation of that
14 number?

15 A. Yes.

16 Q. And in what format did you have the
17 compilation?

18 A. It was given to the Department of
19 Justice in the Department of Justice report.

20 Q. Do you know who prepared that
21 compilation of the number of detainees to be
22 transported to Stroger each month?

23 A. The compilation had nothing to do with
24 the transportation. It had to do with the



1 number that we referred.

2 Q. Could you tell us in what format the
3 compilation of the number of patients referred
4 to Stroger each month was provided to the
5 Department of Justice?

6 A. In the oral health report.

7 Q. Do you know who prepared that
8 compilation of the number of patients referred
9 to Stroger?

10 A. I gave that to them.

11 Q. And how did you compile those numbers?

12 A. When we started using IRIS, our
13 business intelligence unit gave me those
14 numbers.

15 Q. Could you tell us what IRIS means?

16 A. IRIS was the referral platform that we
17 used to refer patients outside for specialty
18 care.

19 Q. So IRIS is an acronym, I-R-I-S, is that
20 right?

21 A. I can't tell you if it stands for
22 something else or if that's the name.

23 Q. Now, you said you got numbers from your
24 business management unit, did I hear that right?



1 A. Business intelligence.

2 Q. And what did you -- how did you go
3 about getting information from business
4 intelligence?

5 A. I asked for it.

6 Q. And what words did you use when you
7 asked for it?

8 A. I asked for the number of patients that
9 were referred from Cermak to oral surgery.

10 Q. And to whom did you make that request?

11 A. I don't recall at that time who it was.

12 Q. Did you make that request in writing or
13 orally or some other way?

14 A. Probably a combination of both.

15 Q. Okay. And did you get the answer to
16 your request in written form or e-mail form or
17 orally or some other form?

18 A. A written form.

19 Q. And do you still have that written
20 form?

21 A. I don't know.

22 Q. Would you be able to look for it?

23 A. I suppose I could look for it.

24 Q. Well, I will be asking your counsel to



1 ask you to look for it.

2 Are you going into your office in these
3 days of COVID?

4 MR. MCELROY: Objection to form.

5 BY MR. FLAXMAN:

6 Q. Well, it's -- could you answer the
7 question?

8 I mean, if you're never going in,
9 you're not going to be able to look for it.

10 A. So we're essential healthcare workers,
11 so I provide care, so I can't sit at home and
12 provide care.

13 Q. Okay. I thank you for your service.

14 In that sentence you wrote that -- you
15 ended it with and will continue to be a
16 challenge; do you see that?

17 A. Yes.

18 Q. What did you mean by that?

19 A. So again, patients that are transported
20 over to Stroger are based upon medical necessity
21 and medical need, and so depending upon who is
22 ever detained at that time and what their
23 medical needs are and who needs to go out, there
24 may be things that are more pressing than



1 someone needing a routine extraction to go to
2 oral surgery. Somebody that needs to go for
3 chemotherapy, of course, would outweigh somebody
4 that needed a routine extraction and could wait,
5 and so that's what I meant by that.

6 Q. Did you ever review any data about the
7 number of persons who were scheduled to go to
8 Stroger for routine oral surgery, but did not
9 make the trip because of someone with a more
10 pressing medical need?

11 A. No, because if they did not make the
12 trip, they were taken the next time.

13 Q. Well, do you know how many people did
14 not make the trip the first time they were
15 scheduled to go to Stroger for oral surgery?

16 A. No, I do not.

17 Q. So could you tell us the basis, if any,
18 for your statement that transportation of
19 inmates has been and will continue to be a
20 challenge?

21 A. I didn't hear the end of your question.

22 Q. Could you tell us -- I'm sorry.

23 Could you tell us the basis for your --
24 the factual basis for your statement that



1 transportation of inmates has been and will
2 continue to be a challenge?

3 A. The factual basis, as I stated before,
4 was the fact that if there was somebody that was
5 scheduled to go for routine oral surgery, and
6 somebody that was more severe needed to go, then
7 the person that was scheduled for a routine
8 extraction would have to wait, and so that that
9 one with more severity would go out first.

10 MS. MCELROY: I'm sorry, I have
11 objection to the previous question, form
12 objection. I don't think you caught it. It was
13 very quick. Thank you.

14 BY MR. FLAXMAN:

15 Q. Did you ever see anyone who was
16 scheduled to go to Stroger for oral surgery who
17 was not sent because of someone with a more
18 pressing medical need?

19 MR. MCELROY: Objection to form.

20 THE WITNESS: I need you to clarify by
21 what you mean by did I ever see.

22 BY MR. FLAXMAN:

23 Q. Did you ever personally observe someone
24 not being sent to Stroger for a scheduled oral



1 surgery appointment because of someone being
2 transported to Stroger with a higher medical
3 need?

4 A. Observe, no.

5 Q. Okay. Did anyone ever tell you that a
6 particular person would have been scheduled to
7 go to Stroger for oral surgery had not gone
8 because of someone with a higher medical need?

9 A. Yes.

10 Q. How many times did that happen?

11 A. I don't recall.

12 Q. Was it more than once?

13 A. Yes.

14 Q. More than 100 times?

15 A. I don't recall.

16 Q. Did you keep any records of the number
17 of times that happened?

18 A. No.

19 Q. Who would make the decision that
20 someone had a higher medical need to go to
21 Stroger than someone scheduled to go for oral
22 surgery?

23 A. It would probably have been their
24 medical doctor.



1 Q. Well, did you ever make a decision that
2 someone with a scheduled appointment to Stroger
3 for oral surgery had a pressing medical need to
4 go there?

5 A. No.

6 Q. Were you ever consulted by another --
7 by a physician at Cermak about whether their
8 patient or the detainee who is scheduled for
9 oral surgery had a more pressing medical need?

10 A. I don't recall.

11 Q. Do you have any factual information on
12 which to base your belief that it was another --
13 it was a doctor who said this person goes to
14 Stroger rather than the person scheduled for
15 oral surgery?

16 MR. MCELROY: Objection to form,
17 incomplete hypothetical, and it calls for
18 speculation.

19 THE WITNESS: I don't recall.

20 BY MR. FLAXMAN:

21 Q. So as far as you know, that decision
22 could have been made by a correctional officer,
23 is that right?

24 A. Correctional officers don't make



1 decisions about healthcare.

2 Q. Okay. All right. And is there any
3 rule or regulation or policy that you've ever
4 seen or which you're aware that relates to who
5 makes, and on what basis makes the decisions
6 that a person's scheduled to go to Stroger
7 should not go because of someone with a higher
8 medical need?

9 MS. MCELROY: Objection to form,
10 foundation.

11 THE WITNESS: I don't recall all of the
12 Cermak policies.

13 BY MR. FLAXMAN:

14 Q. Can you recall any Cermak policy or
15 procedure or recommendation that speaks to
16 making the decision about who goes to Stroger
17 and who doesn't go to Stroger for a scheduled
18 visit?

19 A. Again, there are numerous Cermak
20 policies. I don't recall each and every one, so
21 I'm unable to answer that question with a
22 specific policy.

23 Q. Let me direct your attention to the
24 last paragraph of your e-mail that's in



1 Deposition Exhibit No. 13.

2 In the second sentence you wrote that
3 we have budgeted up to 20 hours a week; do you
4 see that?

5 A. Yes.

6 Q. Did the we include you?

7 A. We referenced Cermak, and I consider my
8 part -- myself part of Cermak.

9 Q. Okay. And does that mean that you were
10 agreeing that 20 hours a week had been budgeted
11 for an oral surgeon to work at Cermak Hospital
12 as of April 8th, 2016?

13 A. No, that means not necessarily that I
14 was agreeing, but that's what it was.

15 Q. Let me ask you to look at Exhibit 14.
16 Can you tell us what that is?

17 A. It appears to be an e-mail thread.

18 Q. And am I correct that the e-mail chain
19 starts on Page 2 with your e-mail of April 8th,
20 2016 that we just looked at?

21 A. Yes.

22 Q. And if we go back to Page 1, is the
23 beginning or the second e-mail on that page
24 something that appears to have been written in



1 response to your e-mail of April 8, 2016 at
2 9:11 a.m.?

3 A. I can't say that, because the e-mail
4 that appears here is -- it doesn't -- it doesn't
5 appear -- the thread doesn't appear to be in its
6 entirety.

7 Q. Okay.

8 A. I believe part of it is redacted, and
9 it's written twice, so I can't -- I can't say
10 that.

11 Q. Well, let me ask you to look at
12 Exhibit 13 again.

13 A. I'm looking at Exhibit 13.

14 Q. Exhibit 13, could you read the subject
15 for us of that e-mail?

16 A. It says yesterday.

17 Q. And if we look at Exhibit 14, there's
18 an e-mail to you from Mohammed K. Q-A-I-S-I,
19 that -- can you tell us the subject line of
20 that?

21 A. It says RE yesterday.

22 Q. Okay. That's the same as the e-mail
23 that's on Exhibit 13, is that correct?

24 A. That is -- the e-mail that I wrote on



1 Exhibit 13 is to George Panos.

2 Mohammed Qaisi is not copied on this
3 e-mail, nor is he a recipient on this e-mail.

4 So I cannot state that he got this
5 e-mail from me or that it wasn't forwarded or --
6 and there's some missing information in between.

7 Q. Okay. Who is Dr. Qaisi, Q-A-I-S-I?

8 A. Dr. Qaisi is an oral surgeon.

9 Q. And back in April of 2016, where did he
10 work?

11 A. Stroger.

12 Q. Do you remember getting an e-mail from
13 Dr. Qaisi?

14 A. Dr. Qaisi?

15 Q. Dr. Qaisi, excuse me. On April of 2016
16 where he tells you that they were losing one of
17 their OMFS attendings on April 15th?

18 A. I mean, that's what the e-mail says.

19 Q. Do you remember getting an e-mail from
20 that doctor stating that I still think one day
21 of coverage is still very doable?

22 A. That's what it says.

23 Q. From April 8th of 2016 to the present
24 time -- let me go back.



1 what does one day of -- is your
2 understanding of one day of coverage that
3 Stroger would provide an oral surgeon and
4 attendings and residents to work at Cermak one
5 day a week?

6 A. I can't tell you what he meant by this
7 in 2016.

8 Q. All right. My question was is it your
9 understanding of what's written there that
10 that's what -- he was conveying that information
11 to you?

12 MR. MCELROY: Object to form and
13 foundation.

14 THE WITNESS: Again, that's not what
15 I'm understanding, and I can't tell you that
16 that was my understanding in 2016.

17 Q. Okay. Did Stroger ever provide one day
18 of oral surgeon coverage at Cermak at any time
19 from April 8th, 2016 to the present?

20 A. No.

21 Q. Okay. The top -- the first e-mail on
22 this page is dated April 11, 2016, 9:04 a.m.; do
23 you see that?

24 A. Yes.



1 Q. And is that -- is that your e-mail?

2 A. Yes.

3 Q. And to whom did you address it?

4 A. Mohammed Qaisi.

5 Q. Was that the same subject as the e-mail
6 you wrote -- or the e-mail that's part of
7 Exhibit 13?

8 A. Yes.

9 Q. Okay. What did you write on April 11,
10 2016 at 9:04 a.m.?

11 A. It says I am open to whatever you can
12 give, let me know.

13 Q. Okay. Let me ask you to look at
14 Exhibit 15. Does this Exhibit 15 contain an
15 e-mail with your name on it dated July 20 of
16 2016, 12:06 p.m.?

17 A. Yes.

18 Q. Did you write there we have had many
19 challenges with that position?

20 A. Correct, yes.

21 Q. By that position, do you mean the oral
22 surgeon position at Cermak?

23 A. I would assume that.

24 Q. Could you tell us as best you can what



1 you meant by many challenges?

2 A. I would have to say that it would have
3 been the fact that; one, the salary associated
4 with that position; and two, the candidate that
5 -- (audio interruption) was willing and wanted
6 to come work with us and had problems with --
7 (audio interruption)

8 Q. And then the second sentence you wrote
9 we are making headway in getting someone to come
10 over; do you see that?

11 A. Yes.

12 Q. Were you making headway to get someone
13 to come over back in July of 2016?

14 A. We had talks with oral surgery about
15 them coming over to the mini clinic that's
16 referenced in exhibit -- I believe that's
17 Exhibit either 12 or 13.

18 Q. When you say we had talks, who do you
19 mean by we?

20 A. Myself, I believe, at some point Dr.
21 Townsend had been involved in talking to oral
22 surgery.

23 Q. Anybody else?

24 A. I don't recall who else.



1 Q. why did you have talks with Stroger
2 about somebody coming over?

3 A. Because, again, this was a position
4 that had been posted back in 2012 that had never
5 been filled.

6 Q. So did you ever -- or had you by July
7 20th of 2016 formed the opinion that it was
8 necessary to have someone come over to provide
9 oral surgery services at Cermak?

10 MS. MCELROY: Objection to form.

11 THE WITNESS: No, I can't say that I
12 have formed that opinion.

13 BY MR. FLAXMAN:

14 Q. Okay. And why were you interested in
15 making headway in getting someone to come over
16 without having formed that opinion?

17 A. Again, as I stated before, this was
18 something that they had been working on, Cermak
19 had been working on since, I believe, 2012, and
20 it had not made any progress.

21 Q. Did you ever learn that in 2006 the
22 oral surgeon had been working full-time at
23 Cermak?

24 MR. MCELROY: Objection to foundation.



1 THE WITNESS: Again, I had heard that,
2 but I had never received any documentation, and
3 have yet to have any kind of documentation that
4 supports that an oral surgeon was full-time at
5 Cermak.

6 Q. Have you ever looked for any records
7 showing whether or not an oral surgeon worked
8 full-time at Cermak in 2006?

9 A. I believe someone -- other people had
10 looked for those records, and they did not
11 exist.

12 Q. Do you ever look at the Cook County
13 budget for 2006, and noticed that there was an
14 oral surgeon position that was funded and
15 filled?

16 A. I can't say that I did.

17 Q. Do you know that Cook County publishes
18 its budget each year; do you know that?

19 A. Yes, I do.

20 Q. Okay. And in this Exhibit 15 you wrote
21 that there's additional equipment that is needed
22 in order for an oral surgeon to practice at
23 Cermak, and then you wrote something, but what
24 did you write after that?



1 A. I said we are still working on that
2 piece as we have an oral surgeon that is now
3 ready to come.

4 Q. The sentence before that talked about
5 an x-ray machine and drills?

6 A. Yes.

7 Q. What kind of drills did you need?

8 A. Surgical handpieces.

9 Q. Were those in place at Cermak back in
10 July of 2016?

11 A. No.

12 Q. And what kind of an x-ray machine was
13 that you referred to in Exhibit 15?

14 A. A panoramic x-ray.

15 Q. Is that the one that you had one, but
16 it wasn't working?

17 A. That is correct.

18 Q. Did you ever get those drills, surgical
19 drills?

20 A. No.

21 Q. Why does an oral surgeon require
22 surgical drills?

23 A. It depends upon what kind of
24 extractions that they're doing. Not all of



1 their extractions requires the use of a surgical
2 drill, but some of them do.

3 Q. Can a general dentist look at a tooth
4 and decide whether or not it needs a particular
5 type of surgical drill to extract?

6 MR. MCELROY: Objection to form,
7 speculation.

8 THE WITNESS: Again, a general dentist
9 can look at a tooth and -- (audio interruption)
10 extract that tooth. Not every tooth needs a
11 surgical drill, and a surgical drill is not
12 required for every extraction or surgical
13 extraction.

14 Q. Well, let me ask the reporter if you
15 got all of that.

16 (Whereupon, a discussion was had
17 off the record.)

18 (Whereupon, the record was read
19 as requested.)

20 THE WITNESS: Again, a general dentist
21 can look at a tooth and determine whether or not
22 it's within their skillset to be able to extract
23 a tooth.

24 Not every tooth that requires



1 extraction needs a surgical drill to remove that
2 tooth from the oral cavity.

3 Not every surgical extraction requires
4 a drill to remove the tooth from the oral
5 cavity.

6 There are some that do require surgical
7 drills based upon the individual presentation of
8 that tooth.

9 BY MR. FLAXMAN:

10 Q. So my original question was whether a
11 general dentist can look at a tooth and say
12 whether or not an extraction of that tooth would
13 require a surgical drill?

14 A. And again --

15 MR. MCELROY: Objection to form,
16 incomplete hypothetical, calls for speculation.

17 BY MR. FLAXMAN:

18 Q. And my question was is there -- can a
19 general dentist make the determination of what
20 type of surgical drill will be required for an
21 extraction from looking at the tooth?

22 MR. MCELROY: Same objections.

23 THE WITNESS: And again, it depends.

24 BY MR. FLAXMAN:



1 Q. Does it depend on whether or not the
2 surgeon -- excuse me -- the general dentist is
3 able to see the tooth?

4 A. It depends on a number of different
5 factors.

6 Q. Am I correct that the decision of what
7 type of surgical drill is required is often made
8 by the oral surgeon in the course of performing
9 the extraction?

10 MR. MCELROY: Objection to form, calls
11 for speculation.

12 THE WITNESS: It's often made by a
13 general dentist in the course of performing an
14 extraction.

15 BY MR. FLAXMAN:

16 Q. Okay. Am I correct there are
17 particular types of surgical drills that are not
18 available to general dentists working at Cermak?

19 A. There are particular types that are not
20 available, that is correct.

21 Q. Am I also correct that there are
22 particular extractions that are -- that should
23 be performed by an oral surgeon rather than by a
24 general dentist?



1 A. You are not correct.

2 Q. Is a general dentist able to perform
3 each type of extraction that is performed by an
4 oral surgeon?

5 A. It depends upon the individual skillset
6 and training.

7 Q. Okay. And are the dentists who work at
8 Cermak among the highest ranking skillsetters --
9 well, let me rephrase that question.

10 Are the dentists who work -- do the
11 dentists who work at Cermak have the highest
12 level of skills of general dentists in Cook
13 County?

14 MR. MCELROY: Objection to form, calls
15 for speculation.

16 THE WITNESS: Again, I cannot compare
17 the dentist at Cermak to a variety of other
18 dentists.

19 I can tell you that the dentists at
20 Cermak are very skilled. Many of them have a
21 similar education and/or training.

22 Q. Are there some of them who are not
23 allowed to perform extractions?

24 MR. MCELROY: Objection to form and



1 relevance.

2 THE WITNESS: There is no one currently
3 at Cermak that cannot perform extractions.

4 BY MR. FLAXMAN:

5 Q. In the last five years has there ever
6 been a dentist employed at Cermak who was not
7 permitted to perform extractions?

8 MR. MCELROY: Objection to form and to
9 relevance, and as far as this goes into any
10 testimony regarding an FPTE, I'm instructing the
11 witness not to answer.

12 MR. FLAXMAN: Excuse me, are you
13 instructing the witness not to answer on grounds
14 of relevance?

15 MS. MCELROY: No, if this regards -- if
16 her answer entails anything regarding to do with
17 privileged information based on an FPTE, then I
18 am instructing her not to answer, but she can
19 answer the question.

20 BY MR. FLAXMAN:

21 Q. Could you answer the question, please?

22 A. Yes, there was an employee where the
23 extraction privileges were taken away for a
24 period of time.



1 Q. And what was that period of time?

2 A. I don't recall.

3 Q. Was it more than a week?

4 A. Yes.

5 Q. Was it more than a year?

6 A. I don't recall the timeframe.

7 Q. Is there anything you can look at that
8 would refresh your recollection as to the
9 timeframe?

10 A. No, I don't believe so.

11 Q. Were you involved in removing the
12 extraction privileges of that dentist?

13 A. Yes.

14 Q. Were you involved in restoring the
15 extraction privileges of that dentist?

16 A. Those privileges were not restored.

17 Q. Does that dentist still work at Cermak?

18 A. That dentist does not -- (audio
19 interruption).

20 Q. You cut out.

21 A. I said that dentist does not still work
22 at Cermak.

23 Q. When did she stop working at Cermak?

24 A. Sometime in 2019.

1 Q. Did she resign?

2 MR. MCELROY: Objection to form and
3 relevance, and if this has anything to do with
4 the FPTE or credentialing, I'm going to instruct
5 the witness not to answer.

6 BY MR. FLAXMAN:

7 Q. Did she resign her position at Cermak?

8 A. No.

9 Q. Was she terminated?

10 MS. MCELROY: I object to -- (audio
11 interruption) but she can answer.

12 BY MR. FLAXMAN:

13 Q. I can't hear the answer.

14 A. I cannot answer.

15 Q. Do you know whether or not she was
16 terminated?

17 A. I cannot answer.

18 Q. Why can't you answer?

19 A. Because that's privileged information.

20 Q. Could you tell us the nature of the
21 privilege or could your counsel tell you the
22 nature of the privilege that you're asserting?

23 MR. MCELROY: Yeah, I've asserted the
24 deliberative process privilege and also the



1 privileged information contained in this
2 dentist's FPTE, which is privileged since it is
3 dealing with credentialing, and it's still
4 ongoing. It is not a resolved matter.

5 MR. FLAXMAN: Well, my question was not
6 about credentialing -- (audio interruption) to
7 be properly asserted in this context. It wasn't
8 about why. It was about was that person the
9 subject of an involuntary separation, and are
10 you -- (audio interruption).

11 MS. MCELROY: If you can answer the
12 question.

13 THE COURT REPORTER: Excuse me, Mr.
14 Flaxman, you were cutting out.

15 MR. FLAXMAN: I don't remember what I
16 said. Do you want to help me? Lisa, could you
17 help?

18 MS. MCELROY: You cut out, so you have
19 to ask it again. I don't know.

20 BY MR. FLAXMAN:

21 Q. Could you tell us whether or not that
22 person was subject to an involuntary
23 termination?

24 MR. MCELROY: And I'm going to object

1 to the privilege of the FPTE. If you can answer
2 without going into the FPTE, you may.

3 THE WITNESS: I can't answer.

4 BY MR. FLAXMAN:

5 Q. Is that person still on the payroll of
6 Cook County Health?

7 A. I'm not sure.

8 Q. You have to say it again. You cut out.

9 A. I said I'm not sure.

10 Q. Okay. And in the last sentence on
11 Exhibit 15 you wrote we are still working on
12 that piece as we have an oral surgeon that is
13 now ready to come; do you see that?

14 A. Yes.

15 Q. Was that Dr. Stec that we talked about
16 before?

17 A. It could have been.

18 Q. Well, let's look at Exhibit 16. Does
19 this begin with an e-mail that you wrote in
20 September 20 of 2016?

21 A. It begins with an e-mail from
22 September 20th, 2016, but not the e-mail from
23 the previous exhibit.

24 Q. Well, did you write that the oral



1 surgeon can begin tomorrow if we had the
2 equipment?

3 A. I did.

4 Q. why did you write that?

5 A. I don't recall.

6 Q. Did you have the equipment for an oral
7 surgeon to begin work on September 21st of 2016?

8 A. No.

9 Q. Okay. And who is Dr. Fegan, F-E-G-A-N?

10 A. Chief Medical Officer.

11 Q. Let me ask you to look at Exhibit 17.
12 Can you tell us what this is?

13 A. An e-mail.

14 Q. Do you remember submitting a request
15 for a digital x-ray?

16 A. I believe I did.

17 Q. Did you ever get a digital x-ray at
18 Cermak?

19 A. No.

20 Q. Are x-rays taken at Cermak?

21 A. Yes.

22 Q. And are they -- do you use film?

23 A. Yes.

24 Q. Now, you've worked as a dentist in

1 private practice, haven't you, ma'am?

2 A. Yes.

3 Q. When is the last time you used film for
4 x-rays?

5 MR. MCELROY: Objection to form and
6 relevance.

7 You can answer.

8 THE WITNESS: Film in private practice
9 or film at County?

10 BY MR. FLAXMAN:

11 Q. Film in private practice.

12 MR. MCELROY: Same objections.

13 THE WITNESS: I don't recall.

14 BY MR. FLAXMAN:

15 Q. Well, was it in 2017?

16 A. I didn't work in private practice in
17 2017.

18 Q. Do you know why it was that -- or why
19 it is that digital x-rays are not available or
20 are not in use at Cermak?

21 A. No, I do not know.

22 Q. Have you submitted requests for digital
23 x-rays at the Cook County Jail?

24 A. Yes.

1 Q. Have those requests ever been approved?

2 A. Not to my knowledge.

3 Q. How do you go about -- how did you go
4 about submitting those requests?

5 MR. MCELROY: Objection to form.

6 THE WITNESS: There was a form that I
7 would complete.

8 BY MR. FLAXMAN:

9 Q. Do you know the name of that form?

10 A. I don't recall the name of it.

11 Q. And after you completed the form, what
12 would you do with it?

13 A. It was given to budget.

14 Q. So is this a form you were submitting
15 for the operating budget of Cook County Health?

16 A. This is for a capital request.

17 Q. And did you also complete forms for
18 budget for personnel requests?

19 A. I don't recall.

20 Q. Did you keep a copy of the form or
21 forms you completed for capital requests?

22 A. I don't recall.

23 Q. Did you -- is there anything you could
24 look at that would refresh your recollection



1 about whether you completed -- you retained such
2 form?

3 A. No.

4 Q. why did you submit --

5 MR. MCELROY: Can we take a five-minute
6 break?

7 MR. FLAXMAN: Are we okay?

8 MR. MCELROY: Yeah, can we take a
9 five-minute break?

10 MR. FLAXMAN: Sure.

11 MS. MCELROY: Thank you.

12 (Whereupon, a short recess was
13 taken.)

14 BY MR. FLAXMAN:

15 Q. Let me direct your attention to Page 2
16 of Deposition Exhibit No. 17. In the middle
17 there's an e-mail from you dated September 20 of
18 2016, 2:46 p.m.; do you see that?

19 A. Yes.

20 Q. The first sentence it says Hi, Sandy,
21 the second sentence says I would anticipate
22 there would be anywhere between 50 to 100, maybe
23 more; do you see that?

24 A. Yes.



1 Q. 50 to 100 a month of what were you
2 referring to?

3 A. Of x-rays.

4 Q. Does that mean 50 to 100 patients?

5 A. No, 50 to 100 x-rays.

6 Q. And how many x-rays would be taken of
7 the patient?

8 MR. MCELROY: Objection to form.

9 THE WITNESS: Of multiple patients.

10 BY MR. FLAXMAN:

11 Q. Well, okay. Let me go -- I might be
12 confused about it.

13 Is that x-rays taken by the -- are you
14 referring there to x-rays taken by the panoramic
15 machine?

16 A. Yes.

17 Q. And could you explain to us what a
18 panoramic x-ray machine is?

19 A. It's a x-ray that takes a picture of
20 the jaws and the teeth basically.

21 Q. Does the x-ray machine move to get one
22 x-ray of the entire mouth?

23 A. Yes.

24 Q. And does the -- is there one x-ray



1 taken per patient with the panoramic machine?

2 A. You can take multiple panoramics a
3 patient. It depends.

4 Q. Okay. And in the second sentence you
5 wrote in our other location about 200-plus a
6 month. What was the other location to which you
7 were referring?

8 A. I don't recall.

9 Q. And when you said about 200-plus a
10 month, what did you mean by that?

11 A. The number of x-rays.

12 Q. Okay. Let me direct your attention to
13 No. 19. 18 is a duplicate, I believe. 19 --
14 well, let's go to 19.

15 Do you have that in front of you?

16 A. Yes.

17 Q. There's a reference there to Dr.
18 Townsend stating they are mandated to have an
19 oral surgeon on staff.

20 Do you know whether or not Cook County
21 Health Services was mandated to have an oral
22 surgeon on staff as of January 27, 2016?

23 A. No.

24 Q. That e-mail appears to be from Brandi

1 DeLoatch, D-E, capital L-O-A-T-C-H. Do you know
2 who Brandi DeLoatch is?

3 A. Yes, she worked in medical staff
4 offices in the credentialing department.

5 Q. Was she a physician?

6 A. No.

7 Q. Was she a dentist?

8 A. No.

9 Q. Do you know where she's employed now?

10 A. No, I do not.

11 Q. Do you know when she left County?

12 A. I don't know that she left County.

13 Q. Okay. Do you know if she still works
14 in credentialing services?

15 A. She does not.

16 Q. Okay. Did anybody ever tell you about
17 problems with Dr. Stec's file?

18 MS. MCELROY: Objection to form.

19 THE WITNESS: The e-mail says can you
20 review this messy incomplete file before we
21 send. At this point it would never get past
22 credentialing committee.

23 BY MR. FLAXMAN:

24 Q. What was messy and incomplete about Dr.



1 Stec's file?

2 A. I don't recall.

3 Q. Now, Exhibit 20 is a collection of 76
4 documents, many of which you have already looked
5 at.

6 Did you collect these documents in the
7 course of responding to this litigation, if you
8 recall?

9 A. No, I did not.

10 Q. Okay. Do you know how these documents
11 were compiled?

12 A. No, I do not.

13 Q. All right. Let's skip to Exhibit 21.

14 (Whereupon, a discussion was had
15 off the record.)

16 BY MR. FLAXMAN:

17 Q. Exhibit 21 I will state are 12 pages
18 that have been extracted from documents filed in
19 Case No. 10 CV 2946. These are from the
20 monitors reports.

21 Did you review all of the monitor
22 reports in the Cripa, C-R-I-P-A, litigation that
23 pertained to dental services?

24 A. I'm not familiar with Cripa litigation.



1 Q. Well, the consent decree with
2 Department of Justice reports, did you look at
3 those reports?

4 A. Yes.

5 Q. Do you remember looking at Page 1? Do
6 you remember ever seeing Page 1?

7 A. I believe so, but because they are not
8 attached to the report, I can't tell you the
9 timeframe that it's referenced in or any of
10 that.

11 Q. Okay. Let me ask you to turn to
12 Page 11, and directing your attention to the
13 third paragraph.

14 A. I'm here.

15 Q. And then the third sentence refers to
16 the average wait time for non-emergent oral
17 surgery for Cermak inmates; do you see that?

18 A. Yes.

19 Q. And did you give Dr. Porsa, P-O-R-S-A,
20 data about the average wait time for
21 non-emergent oral surgery for Cermak inmates?

22 A. Yes.

23 Q. Okay. Was there a vacant -- has there
24 ever been a vacant chief dentist position at



1 Cermak while you've been working for the County?

2 A. Yes, from the time that Dr. Townsend
3 left to the time that it was filled.

4 Q. How long did that take to fill that
5 position?

6 A. I don't recall.

7 Q. Let me direct your attention back to
8 Page 8 of Exhibit 21.

9 Was there ever a time where you believe
10 that a digital panoramic x-ray machine was going
11 to be installed in the RTU unit at the jail?

12 A. There was a time where there was
13 discussion about a digital panoramic x-ray
14 machine being installed in the RTU at intake,
15 not within the dental clinic.

16 Q. Was the plan to do panoramic x-rays of
17 each detainee entering the jail?

18 A. I don't remember what the exact plan
19 was at that time.

20 Q. The second sentence on Page 8 of
21 Exhibit 21 states Cermak hopes to secure at
22 least one oral surgeon for onsite services prior
23 to our return in May of 2017.

24 Do you remember telling the medical



1 monitors from the Department of Justice that you
2 hoped to secure at least one onsite oral surgeon
3 for onsite services before they returned in May
4 of 2017?

5 A. I believe so.

6 Q. Okay. If you look at Page 10 of
7 Exhibit 21, under the second paragraph under
8 monitors' findings it talks about an average of
9 87 referrals per month; do you see that?

10 A. Yes.

11 Q. Did you give data to Dr. Porsa showing
12 that there was an average of 87 referrals per
13 month for oral surgery?

14 A. As stated before, I gave him the
15 information as it relates to the referrals that
16 we had sent over, the referrals that were made
17 from the dentists at Cermak over to oral surgery
18 from our business intelligent unit that were
19 provided.

20 Q. And did business intelligent unit
21 provide you with information about the current
22 average wait time for non-emergent oral surgery
23 for Cermak inmates?

24 A. So all of the referrals were



1 non-emergent because the dentist -- a general
2 dentist made them, and so the dentists are well
3 aware of how long it takes to get into oral
4 surgery. So all of the referrals that we made
5 were non-emergent referrals.

6 Q. That wasn't my question.

7 My question was did the information
8 about non-emergent oral surgery wait time for
9 Cermak inmates that's referred to on Page 10 of
10 Deposition Exhibit No. 21 come from this
11 intelligent unit?

12 A. Yes.

13 Q. Okay. Do you know how they got the
14 data to make that computation?

15 MR. MCELROY: Objection to form and
16 foundation.

17 THE WITNESS: Again, as I previously
18 stated, they took the referrals out of the IRIS
19 system from those that the Cermak dentists had
20 referred over.

21 Q. Now, how do you know that's what they
22 did?

23 A. Because that's how they would look at
24 the referrals that come over.



1 Q. Do you have personal knowledge of the
2 manner in which they performed those
3 calculations?

4 A. If you're asking me did I watch them
5 perform those calculations, no.

6 If you are asking -- if you're asking
7 me did they tell me that that's how it was done,
8 yes.

9 Q. Who told you?

10 A. I don't recall at that time.

11 Q. Was it a man or a woman who told you?

12 A. I don't recall at that time.

13 Q. Did they tell you in writing, orally or
14 in some other way?

15 A. I don't recall.

16 Q. Okay. And the third sentence refers to
17 the existing wait time for Cook County Hospital
18 ambulatory services patients. Do you know the
19 basis for that -- the factual basis for that
20 statement?

21 A. Yes, they looked -- he had the
22 information, because it was provided to him the
23 referrals that came from the ambulatory clinic,
24 and how long they had to wait in comparison to



1 how long Cermak inmates had to wait.

2 Q. Then who's the him to which you refer?

3 A. Dr. Porsa.

4 Q. And who gave the information, if you
5 know, to Dr. Porsa about the existing --

6 A. I provided the information to Dr. Porsa
7 from the information that was given from the
8 business intelligent unit.

9 Q. Did the business intelligent unit give
10 you information about the existing wait time for
11 Cook County Hospital ambulatory services
12 patients?

13 A. So they gave -- what they provided was
14 all of the referrals that were referred to oral
15 surgery both from the ambulatory side and on the
16 Cermak side, and that information that they gave
17 us had when the referral was placed, and when
18 the appointment was scheduled.

19 Q. Do you know who worked on getting that
20 information from Cook County ambulatory services
21 patients?

22 A. It's the same person that did the
23 entire report.

24 Q. Do you have a copy of whatever



1 information you got from business services,
2 business intelligent services?

3 A. I don't recall that. I don't know if I
4 still have it.

5 Q. And have you ever looked for that
6 information?

7 A. I can't say that I have.

8 Q. I didn't get your answer.

9 A. I said I can't say that I have.

10 Q. Well, does that mean you have or
11 haven't, what does that mean -- well, let me
12 rephrase the question.

13 why can't you say if you have?

14 A. Because I don't recall.

15 Q. Okay. The next sentence on Page 10 of
16 Deposition Exhibit 21 refers to OMFS looking to
17 potentially increase hours of support for Cermak
18 oral surgery referrals including some Saturday
19 clinics; do you see that?

20 A. Yes.

21 Q. Has OMFS ever increased its hours for
22 support for Cermak oral surgery referrals?

23 A. Not to my knowledge.

24 Q. Okay. Am I correct that there is the



1 capability to send ten patients from the jail to
2 Stroger in the morning and ten patients from the
3 jail to Stroger in the afternoon, is that right?

4 MS. MCELROY: Objection to form.

5 THE WITNESS: I can't -- I can't speak
6 to that.

7 BY MR. FLAXMAN:

8 Q. Did you ever write that in any of your
9 e-mails?

10 A. On a previous exhibit that you just
11 showed me I did.

12 Q. And where did you get the information
13 from that you used to make that statement?

14 A. It could have been relevant at that
15 particular day.

16 Q. Okay. Has the -- is the Sheriff
17 responsible for transporting detainees from the
18 jail to Stroger Hospital?

19 A. Yes.

20 Q. Do you know if the Sheriff has ever
21 increased the number of detainees that could be
22 transported from the jail to Stroger Hospital
23 from the time you worked for Cook County Health
24 Services?



1 MR. MCELROY: Objection, foundation.

2 THE WITNESS: I don't have that
3 information.

4 BY MR. FLAXMAN:

5 Q. So you don't know, is that correct?

6 A. I do not know.

7 Q. Okay. The next sentence refers to an
8 expansion of Stroger OMFS support hours for
9 Cermak; do you see that?

10 A. Yes.

11 Q. What does that mean, expansion of
12 Stroger OMFS support hours?

13 MR. MCELROY: Objection, form and
14 foundation.

15 THE WITNESS: I don't know. You would
16 have to ask Dr. Porsa.

17 BY MR. FLAXMAN:

18 Q. Well, has Stroger -- OMFS, what does
19 that mean again, is that a clinic at Stroger?

20 A. That's oral maxillofacial surgery.

21 Q. Has the OMFS at Stroger ever increased
22 its support hours for Cermak during the time you
23 worked for County Health Services?

24 A. I can't speak to what he means by



1 support hours, and I'm not -- I can't speak to
2 any certainty in regards to the number of
3 patients that oral surgery has the ability to
4 see as relates to Cermak, which would be
5 indicative of them increasing support hours, so
6 I can't speak to that.

7 Q. And the last sentence of that paragraph
8 refers to a new evening time clinic. Do you
9 know anything about a new evening time clinic
10 that began in September of 2016 at Cermak?

11 A. Yes.

12 Q. Is that -- where was that clinic
13 established?

14 A. In Division 11.

15 Q. Is that clinic still in operation?

16 A. No.

17 Q. When did it stop being in operation?

18 A. I don't recall when.

19 Q. Was it in operation in 2017?

20 A. I don't believe so.

21 Q. Do you know why it stopped being in
22 operation?

23 A. Because we had to increase the wait
24 times.



1 Q. And decrease the wait -- which wait
2 time was decreased?

3 A. That for general -- I mean, just the
4 wait time for general dentistry for the dental
5 clinic.

6 Q. And is there any written --

7 A. Mr. Flaxman, I need to go back, because
8 that clinic was held not only in Division 11,
9 but we also -- because everybody couldn't be
10 transported to Division 11, we also had
11 Division 5 as well. So we had Division 11 and
12 Division 5 so that the other side of California
13 could get to it.

14 Q. Okay. And were both of those clinics
15 established in September of 2016?

16 A. Yes.

17 Q. Is either of those clinics in operation
18 today?

19 A. Yes.

20 Q. Which evening clinic is in operation
21 today?

22 A. No, I thought you were asking me about
23 the overall clinic, not the evening clinic.

24 Q. Okay. Is either evening clinic in



1 operation today?

2 A. No.

3 Q. When did the Division 11 clinic stop --
4 cease its evening time operation?

5 A. They both stopped at the same time, and
6 I don't recall when.

7 Q. Was it in 2017?

8 A. I don't recall when.

9 Q. Is there anything you could look at
10 that would refresh your recollection about when
11 they ceased night time or evening time
12 operations?

13 A. Not that I'm aware of.

14 Q. Is this the documentation upon which
15 you're relying for your statement that DOJ told
16 you you didn't need to hire an oral surgeon to
17 work at Cermak?

18 MR. MCELROY: Objection to form.

19 THE WITNESS: No. Again, as I stated,
20 it was in a monitors' report as well as
21 communication between Department of Justice and
22 Cermak staff when they were onsite.

23 BY MR. FLAXMAN:

24 Q. By the Department of Justice, do you



1 mean the monitor or do you mean attorneys --

2 A. Yes, the monitor.

3 Q. Okay.

4 A. And the attorneys were always present.

5 Q. And who is the attorneys who were
6 present?

7 A. I don't recall.

8 Q. Do you remember the names of any of the
9 attorneys who were present?

10 A. No.

11 Q. Do you know an attorney named Catania,
12 Francis Catania?

13 A. I can't say that I do.

14 Q. Are there any plans at the present time
15 to have an oral surgeon work at the Cook County
16 Jail either on a part-time or full-time basis?

17 MR. MCELROY: Objection to form.

18 THE WITNESS: There are no plans at the
19 present time.

20 BY MR. FLAXMAN:

21 Q. And am I correct that from when you --
22 at some point after you started to work for Cook
23 County Health Services, Cook County decided not
24 to fill the vacant oral surgery position at the



1 Cook County Jail?

2 MR. MCELROY: Objection to form.

3 THE WITNESS: Yes, at some point in
4 time the decision was made not to fill.

5 BY MR. FLAXMAN:

6 Q. And was that a -- was that a decision
7 of Cook County Health Services?

8 A. I can't say that it was Cook County
9 Health.

10 Q. Well, did the Sheriff make that
11 decision?

12 A. The Sheriff is not involved in
13 healthcare.

14 Q. Did somebody who worked for the County
15 make that decision that we would not fill the
16 vacant oral surgery position?

17 A. I'm not sure about who made the final
18 decision. I know that recommendations were
19 made, but that's all I can tell you.

20 Q. Could you tell us what documents you
21 looked at to prepare for this deposition, if
22 any?

23 A. I reviewed the medical charts for the
24 people listed in the actual Complaint.



1 Q. Anything else?

2 A. No.

3 Q. Okay. Was anybody to your knowledge
4 other than Dr. Stec interviewed to fill the
5 vacant oral surgery position?

6 A. I don't recall.

7 Q. All right. I have nothing further.

8 MR. MCELROY: All right. I have no
9 questions.

10 MR. DOMBROWSKI: No questions from the
11 Sheriff.

12 MR. MCELROY: All right. We'll
13 reserve.

14 MR. FLAXMAN: Thank you.
15 We're ordering the original, and I'll
16 send you the exhibits.

17 THE COURT REPORTER: Thank you.

18 MR. FLAXMAN: Okay.

19 THE COURT REPORTER: Copies?

20 MR. MCELROY: Yes, please. Thank you.

21 MR. DOMBROWSKI: The Sheriff will take
22 a copy with the exhibits.

23 (FURTHER DEPONENT SAITH NOT.)

24 (Deposition concluded at 12:46 p.m.)



From: Alexander, Jorelle
Sent: Friday, April 8, 2016 9:07 AM
To: Panos, George
Subject: Yesterday

Good Morning Doc!

I cannot THANK YOU enough!!!!!!! for yesterday! Your talk was well received and I look forward to continued collaborations with you and OMFS. As we spoke yesterday, we are in DESPERATE need for a part-time oral surgeon at CERMAK. I don't know if anyone is interested or if there would be an opportunity to do a mini clinic at Cermak with an attending and residents once a week. I am willing to explore ANY and ALL opportunities. We can certainly look at a way to triage the cases that would still need to go to Strogers those that could be done at Cermak by an Oral Surgeon but we refer quite a few monthly and transporation of inmates has been and will continue to be a challenge. Cermak is only allowed to move 10 patients in the am and 10 patients in the pm for transport to Stroger and we (dental) are lucky to get a spot or two out of the ten especially when there are more pressing medical needs.

Please let me know what your thoughts are. There are budget dollars set aside for the Oral Surgeon that is ~\$100/hr and we have budgeted up to 20 hours a week. Current staff would be eligible if it was not during their current working hours and then would be paid under Cermak's budget for the time spent there.

Thanks again!!!

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