

Exhibit C

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

LIONEL WHITE,)	
)	
<i>Plaintiff,</i>)	
)	No. 17-cv-2877
-vs-)	
)	Judge Sharon Johnson Coleman
CITY OF CHICAGO, et al.,)	
)	
<i>Defendants</i>)	

**PLAINTIFF'S RESPONSE TO DEFENDANT
BRIAN BOLTON'S INTERROGATORIES TO PLAINTIFF**

Plaintiff, Lionel White, by and through his undersigned attorney, and pursuant to Federal Rule of Civil Procedure 33, responds to Defendant Brian Bolton's Interrogatories to Plaintiff as follows:

1. In April 2006, were you using \$100 worth of heroin daily? If yes, please describe, as specifically as possible, other period(s) of time for which your heroin habit would consist of using \$100 worth of heroin daily?

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad, and to the extent that it seeks irrelevant information, is an invasion of privacy. Subject to and without waiving these objections, Plaintiff Lionel White was not using \$100 of heroin daily in April of 2006.

2. Apart from the time period(s) identified in your answer to interrogatory number 1, have there been other periods of time that you used heroin. If yes, describe the amount of heroin that you would use, the frequency of the heroin use, and the time period for when you would use heroin.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad, unduly burdensome and, to the extent that it seeks irrelevant information, is an invasion of privacy.

3. Describe the amount of heroin in weight (measured in grams) and by packaging (ziplock bag, cigarette-pack cellophane, aluminum foil, glass or plastic vials, etc.) that constituted your daily usage of \$100 worth of heroin in April 2006?

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad and unduly burdensome and, to the extent that it seeks irrelevant information, is an invasion of privacy. Plaintiff also objects to the premise of the question, which assumes that he used \$100 worth of heroin daily. Subject to and without waiving these objections, *see* Plaintiff's Objections and Response to Interrogatory No. 1, which is incorporated herein.

4. During April 2006, what is the most amount of heroin, at any one time, measured by weight in grams, that you possessed, either on your person or under your control?

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad and unduly burdensome, not proportional to this case, and to the extent that it seeks irrelevant information, is an invasion of privacy.

5. Where did you purchase or otherwise obtain heroin during the period of time in which you used \$100 worth of heroin daily?

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad and unduly burdensome, and to the extent that it seeks irrelevant information, is an invasion of privacy. Plaintiff also objects

to the premise of the question, which assumes that he used \$100 worth of heroin daily.

6. From whom would you purchase or otherwise obtain heroin during the period of time in which you used \$100 worth of heroin daily.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad and unduly burdensome and to the extent that it seeks irrelevant information, is an invasion of privacy. Plaintiff also objects to the premise of the question, which assumes that he used \$100 worth of heroin daily.

7. Have you ever traded personal services in exchange for heroin? If yes, please describe each instance in which you performed a service in exchange for heroin, by stating what services you provided, when you provided such services, to whom did you provide such services, and how much heroin you received as part of the exchange.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, vague ambiguous with respect to the phrases “traded personal services” and “performed a service in exchange for heroin,” overly broad, and seeks irrelevant information. Subject to and without waiving these objections, Plaintiff answers no to this Interrogatory.

8. Have you ever sold heroin in return for monetary compensation? If yes, please describe each instance in which you sold heroin by describing when you sold the heroin, where you sold the heroin, who did you sell the heroin for, and how much monetary compensation you received in exchange for selling heroin.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad and unduly burdensome, and to the extent that it seeks irrelevant information, is an invasion of privacy. Subject to and without

waiving these objections, Plaintiff was not selling heroin when Sergeant Watts framed him.

9. Have you ever sold heroin and received heroin or any other controlled substance in return as compensation? If yes, please describe each instance in which you sold heroin by describing when you sold the heroin, where you sold the heroin, who did you sell the heroin for, and the amount of heroin or other controlled substance that you received in exchange for selling heroin.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad and unduly burdensome, and to the extent that it seeks irrelevant information, is an invasion of privacy. Subject to and without waiving these objections, Plaintiff was not selling heroin when Sergeant Watts framed him.

10. During the period of time in which you used \$100 worth of heroin daily, please list all the places in which you purchased or otherwise obtained heroin and from whom you would receive the heroin?

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad and unduly burdensome and to the extent that it seeks irrelevant information, is an invasion of privacy. Plaintiff also objects to the premise of the question, which assumes that he used \$100 worth of heroin daily.

11. Did you ever have contact, communicate with, or know of Ben Baker while you were at Ida B. Wells? If so, please describe your interactions with Ben Baker and whether or not you ever received heroin from Ben Baker?

ANSWER: Plaintiff objects to this Interrogatory on the basis that it seeks irrelevant information, objects to the phrase “while you were at Ida B. Wells” as vague and ambiguous, and further objects to the request that Plaintiff

explain whether he ever received heroin from Ben Baker as harassing and an invasion of privacy. Subject to and without waiving these objections, Plaintiff and Ben Baker were childhood friends when each attended Doolittle East Grade School. Plaintiff believes that he and Baker also may have been classmates for a time as students at Phillips High School; however Plaintiff and Baker were nothing more than acquaintances during high school.

Plaintiff's and Baker's families are familiar with each other because they lived in the same community.

12. Did you ever have contact, communicate with, or know of Jamar Lewis while you stayed at Ida B. Wells? If so, please describe all interactions you had with Jamar Lewis and whether or not you ever received any controlled substances from Jamar Lewis.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing and not relevant. Plaintiff further objects to this Interrogatory to the extent that it is vague as to the term "controlled substances" and as to the term "while you stayed at Ida B. Wells." Subject to and without waiving this objection, Plaintiff White answers that he is familiar with Jamar Lewis, but, does not presently recall any specific interactions with Mr. Lewis.

13. Did you use heroin the night before your arrest? If so, please state where you used the heroin, the identity of any person that used the heroin with you, the identity of any person that was present when you used the heroin, and the amount of heroin that you used.

ANSWER: Yes. Plaintiff consumed approximately \$10 of heroin the night before he was arrested in April of 2006. Plaintiff consumed the heroin in Apartment 507 at 575 E. Browning. Plaintiff was alone when he consumed the heroin.

12. Did you use heroin or any other controlled substance on April 24, 2006? If so, please identify the controlled substance that you used, where you used the controlled substance, the identity of any person that used the controlled substance with you, the identity of any person that was present when you used the controlled substance, and the amount of the controlled substance that you used.

ANSWER: Yes. Plaintiff consumed approximately \$10 of heroin on April 24, 2006. Plaintiff consumed the heroin in Apartment 507 at 575 E. Browning.

Plaintiff was alone when he consumed the heroin.

13. Please account for your whereabouts, including who you were with and where you were in the 12 hours before your April 24, 2006 arrest. If you are to say you were at 575 E. Browning, please specify where exactly you were in the building.

ANSWER: To the best of Plaintiff's present recollection, he spent the night in Apartment 507 at 575 E. Browning. Plaintiff awoke in the morning, sometime between about 9 or 10 a.m. and went out. Plaintiff then returned to the apartment. It was at that time that Defendants Watts and Jones forcibly entered the apartment, assaulted Plaintiff, and wrongfully arrested him.

14. Have you ever been a part of a street gang? If so, please provide the following information:

A. Which gang did you belong to?

B. When did you join?

C. List all of the ranks that you held and when you held each such rank?

D. Did you ever participate in selling narcotics or narcotics trafficking as part of gang activity? If yes, please describe your role in the selling of narcotics or narcotics trafficking.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing and seeks irrelevant information.

15. Have you committed any armed robberies? If so, how many have you committed?

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, seeks irrelevant information, and is an invasion of privacy.

16. With respect to Defendants Smith, Bolton, Leano, Gonzalez, and Nichols, please state with specificity what wrongful action each defendant performed related to your April 24, 2006 arrest and the facts upon which you base the allegations.

ANSWER: Plaintiff objects to this Interrogatory as a premature contention interrogatory, as discovery is at an early stage and Defendants have not yet been deposed, and so Plaintiff does not yet have complete information about Defendants' specific actions that gave rise to the claims in Plaintiff's complaint. Subject to and without waiving these objections, Plaintiff responds by reference to his First Amended Complaint and the documents that have been produced in the case to date. Specifically, Plaintiff refers to the police reports, which indicate that these Defendants were present for and attested to the fabricated facts underlying Plaintiff's false arrest. *See* LIONEL WHITE 00368-00372. Investigation continues.

17. On April 24, 2006, did you have a conversation with Captain Edward W. Griffin? If so, please describe in detail the contents of the conversation.

ANSWER: Plaintiff does not presently recall any conversation with Captain Edward W. Griffin on April 24, 2006. It is possible that viewing documents might refresh his recollection on this question.

18. Identify by name and address the "bad company" you were in with that you relayed to Captain Griffin on April 24, 2006.

ANSWER: Plaintiff does not presently recall any conversation with Captain Edward W. Griffin on April 24, 2006. It is possible that viewing documents might refresh his recollection on this question.

19. Were you truthful when you spoke to Judge Prantle [sic] in your criminal court proceedings June 26, 2006.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is vague, in that Defendants have not identified any specific statement or statements. Subject to and without waiving this objection, Plaintiff White truthfully explained to Judge Pantle that Chicago Police Department officers beat and framed him.

20. Have you committed any unlawful acts subsequent to April 24, 2006 that did not result in arrest. If so, describe all unlawful acts and the location and dates of occurrence.

ANSWER: Plaintiff objects to his Interrogatory on the basis that it is harassing, overly broad, and unduly burdensome, not proportional to the needs of this case.

21. Please identify any and all statements you have made about the events giving rise to your complaint by providing the date of such statement, the purpose of the statement, the identity of all individuals present for the statement, the location where the statement was made, and whether the statement was in any way recorded.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is overly broad, and unduly burdensome in requiring he identify every single statement made about the events giving rise to his complaint, and that it seeks privileged information to the extent it requests information about conversations that Plaintiff had with his attorneys or with mental health

practitioners. Plaintiff further objects that it is overly burdensome, and disproportionate to the needs of the case, and that the qualifier, “the purpose of the statement,” is vague and ambiguous. Plaintiff further objects because he could not possibly recall all statements that he has made about the events that gave rise to the complaint, which took place many years ago.

Subject to and without waiving these objections, over the years, Plaintiff made statements to various people about the facts giving rise to his Complaint. Plaintiff presently recalls that, in addition to statements he made to his attorneys, he made statements to the intake nurse at Provident Hospital about the physical abuse the police inflicted on him upon his hospital visit resulting from the assault by Defendants during his arrest. Additionally, Plaintiff recalls that he made statements to the Stateville and Dixon penitentiary psychiatrists regarding his mental health being adversely affected by the police assaulting him and wrongfully arresting him. He also recalls giving a statement to internal affairs at Stateville Prison. Plaintiff also has made various statements to his family members about being assaulted and framed by the police. He furthermore made statements to the media upon his exoneration. Investigation continues.

22. Have you ever communicated with (either directly or through a legal representative) any federal investigator or prosecutor regarding alleged corruption and/or alleged misconduct by Chicago Police Officers? If so, please state the approximate date(s) of the communication; the subject of the communication; provide a substantive summary of the statements made in connection with the communication; identify all persons present and/or privy to the communication; and whether the communication was recorded in any way, and, if so, how.

ANSWER: Plaintiff wrote to the FBI while incarcerated at Stateville Prison to inform federal authorities that Sergeant Watts and other officers had abused and framed him.

23. Provide complete names, current addresses, and telephone numbers along with birth dates and/ or approximate ages for Nina, Shabook, and Sabrina identified as witnesses in CR 313536.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it seeks information outside his possession, custody, and control. Subject to those objections, Plaintiff does not have the requested information.

Dated: September 17, 2018

Respectfully submitted,

LIONEL WHITE

/s/Sean Starr
One of Plaintiff's attorneys

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CERTIFICATE OF SERVICE

I, Sean Starr, an attorney, certify that on September 17, 2018, I served Plaintiff's Response to Defendant Bolton's First Set of Interrogatories to Plaintiff on all counsel of record.

/s/ Sean Starr

Sean Starr

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VERIFICATION

I, Lionel White, verify that I have reviewed the attached Plaintiff Lionel White's Response to Defendant Brian Bolton's Interrogatories and I certify that the answers are true and correct to the best of my knowledge, information, and memory.

Date: 9-17-18

Lionel White