

# Exhibit C

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

COORDINATED CASES	)	
	)	
<i>Baker v. Chicago et al.</i> , No. 16-cv-8940	)	No. 16-CV-8940
<i>White v. Chicago et al.</i> , No. 17-cv-2877	)	
<i>Powell v. Chicago et al.</i> , No. 17-cv-5156	)	Honorable Judge Andrea R. Wood
<i>Carter v. Chicago et al.</i> , No. 17-cv-7241	)	and Honorable Magistrate Judge Sheila Finnegan
<i>Forney v. Chicago et al.</i> , No. 18-cv-3474	)	
<i>Shenault v. Chicago et al.</i> , No. 18-cv-3477	)	
<i>Shenault Jr. v. Chicago et al.</i> , No. 18-cv-3478	)	
<i>Gibbs v. Chicago, et al.</i> , No. 18-cv-5119	)	
<i>Gipson v. Chicago, et al.</i> , No. 18-cv-5120	)	
<i>Jackson v. Chicago, et al.</i> , No. 18-cv-5121	)	
<i>Sanders v. Chicago, et al.</i> , No. 18-cv-5122	)	
<i>James v. Chicago, et al.</i> , No. 18-cv-5123	)	
<i>Jefferson v. Chicago, et al.</i> , No. 18-cv-5124	)	
<i>Saunders v. Chicago, et al.</i> , No. 18-cv-5125	)	
<i>McDaniels v. Chicago, et al.</i> , No. 18-cv-5126	)	
<i>McNairy v. Chicago, et al.</i> , No. 18-cv-5127	)	
<i>Scott v. Chicago, et al.</i> , No. 18-cv-5128	)	
<i>Rainey v. Chicago, et al.</i> , No. 18-cv-5129	)	
<i>Smith v. Chicago, et al.</i> , No. 18-cv-5130	)	
<i>Thomas v. Chicago, et al.</i> , No. 18-cv-5131	)	
<i>Thomas v. Chicago, et al.</i> , No. 18-cv-5132	)	
<i>White, Jr. v. Chicago, et al.</i> , No. 18-cv-5133	)	
<i>Jefferson v. Chicago et al.</i> , No. 18-cv-8182	)	
<i>Blair v. Chicago et al.</i> , No. 19-cv-0127	)	
<i>Curtis v. Chicago et al.</i> , No. 19-cv- 0128	)	
<i>Henderson v. Chicago, et al.</i> , No. 19-cv-0129	)	
<i>Ollie v. Watts et al.</i> , No. 19-cv-0131	)	
<i>Wilbourn v. Chicago et al.</i> , No. 19-cv-0132	)	
<i>Thomas v. Chicago et al.</i> , No. 19-cv-0133	)	
	)	
Plaintiffs,	)	
v.	)	
	)	
CITY OF CHICAGO, <i>et al.</i> ,	)	
	)	
Defendants	)	
	)	
	)	
	)	
	)	

**COORDINATED PLAINTIFFS' FEBRUARY 4, 2019  
RULE 26(a)(1) DISCLOSURES**

**In addition to the individuals previously disclosed in the *Baker and White Sr.* cases, Plaintiffs in the coordinated cases hereby make the following disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):**

**i.** The following people are likely to have discoverable information that Plaintiffs may rely on to support their claims:

1. Ben Baker, Plaintiff, can be reached through Plaintiff's counsel.
2. Clarissa Glenn, Plaintiff, can be reached through Plaintiff's counsel.
3. Lionel White Sr., Plaintiff, can be reached through Plaintiff's counsel.
4. Bruce Powell, Plaintiff, can be reached through Plaintiff's counsel.
5. William Carter Plaintiff, can be reached through Plaintiff's counsel.
6. Robert Forney, Plaintiff, can be reached through Plaintiff's counsel.
7. Angelo Shenault, Plaintiff, can be reached through Plaintiff's counsel.
8. Angelo Shenault Jr., Plaintiff, can be reached through Plaintiff's counsel.
9. Marcus Gibbs, Plaintiff, can be reached through Plaintiff's counsel.
10. Leonard Gipson, Plaintiff, can be reached through Plaintiff's counsel.
11. Jamell Sanders, Plaintiff, can be reached through Plaintiff's counsel.
12. Shaun , Plaintiff, can be reached through Plaintiff's counsel.
13. Thomas Jefferson, Plaintiff, can be reached through Plaintiff's counsel.
14. Frank Saunders, Plaintiff, can be reached through Plaintiff's counsel.
15. Anthony McDaniels, Plaintiff, can be reached through Plaintiff's counsel.
16. Andre McNairy, Plaintiff, can be reached through Plaintiff's counsel.
17. Christopher Scott, Plaintiff, can be reached through Plaintiff's counsel.
18. Lee Rainey, Plaintiff, can be reached through Plaintiff's counsel.
19. Taurus Smith, Plaintiff, can be reached through Plaintiff's counsel.
20. Henry Thomas, Plaintiff, can be reached through Plaintiff's counsel.
21. Phillip Thomas, Plaintiff, can be reached through Plaintiff's counsel.
22. Lionel White, Jr., Plaintiff, can be reached through Plaintiff's counsel.
23. Goleather Jefferson Plaintiff, can be reached through Plaintiff's counsel.
24. Harvey Blair Plaintiff, can be reached through Plaintiff's counsel.
25. Joshua Curtis, Plaintiff, can be reached through Plaintiff's counsel.
26. Rickey Henderson, Plaintiff, can be reached through Plaintiff's counsel.
27. George Ollie, Plaintiff, can be reached through Plaintiff's counsel.
28. Vondell Wilbourn, Plaintiff, can be reached through Plaintiff's counsel.

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**Plaintiff Lionel White Jr.'s Additional Rule 26(a)(1)(A)(i) Disclosures**

460. Kevin Ochalla – Plaintiff's public defender – may have knowledge of the circumstances surrounding Plaintiff's false conviction – phone/address unknown at this time.

Plaintiffs' investigation into this matter continues. Plaintiffs reserve the right to modify and supplement this list as more information becomes available.

**ii.** The following documents, data compilations, and tangible things in the possession, custody, or control of Plaintiff may be used to support Plaintiffs claims or defense:

Plaintiff has already produced a significant amount of documents during the course of litigation in *Baker v. Chicago*, Case No. 16-CV-8940. These documents include, *inter alia*, police reports, criminal trial transcripts, post-conviction petitions, post-conviction transcripts, judicial opinions, pleadings in Plaintiffs' certificate of innocence proceedings, and a variety of other case materials. The documents bear bates numbers BAKER GLENN 000001-036191.

Plaintiffs' investigation into this matter continues and Plaintiffs reserve the right to modify and supplement this list as more information becomes available.

**iii.** Plaintiffs have suffered and continue to suffer incalculable damage, including psychological damage, anguish, and humiliation, which were caused by their wrongful conviction and loss of freedom, the destruction of their reputations, the disruption of their life and intimate relationships, and the suspension of their ability to pursue a career and raise a family. In addition, Plaintiffs Gibbs, McDaniels, P. Thomas, Rainey; Sanders, White Jr., Saunders, and Baker have suffered physical damage as a result of Defendants' wrongdoing, and several Plaintiffs, including Gipson and P. Thomas, incurred substantial costs defending

themselves against the wrongful charges brought against them. Plaintiffs seek compensatory damages from all Defendants and punitive damages from the Individual Defendants. A jury or juries will determine the appropriate amount of these damages. In addition, Plaintiffs seek attorney's fees pursuant to 42 U.S.C. ¶ 1988. At this time, Plaintiffs have not made any computation of their damages.

**iv.** Not applicable.

Respectfully submitted,

/s/ Sean Starr

One of the Attorneys for Plaintiffs Ben Baker, Clarissa Glenn, Marcus Gibbs, Leonard Gipson, Allen Jackson, Shaun James, Thomas Jefferson, Anthony McDaniels, Andre McNairy, Lee Rainey, Jamell Sanders, Frank Saunders, Christopher Scott, Taurus Smith, Henry Thomas, Phillip Thomas, Lionel White, Jr., and Lionel White, Sr.

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