

# **EXHIBIT A**



**HALE & MONICO**  
AMERICA'S JUSTICE ATTORNEYS

December 8, 2023

To: All Counsel of record, via email

Re: In Re: Watts Coordinated Pretrial Proceedings  
Case Number: 19-cv-01717

Plaintiffs' Counsel,

I write because I'd like to issue subpoenas to IDOC to obtain certain calls for certain test case Plaintiffs. I'd also like to obtain certain calls that you currently possess. And I'd like your permission to listen to certain calls that I currently possess. If you agree to my below requests, please advise. If you disagree with any of my below requests, please advise of your availability to meet and confer soon.

IDOC does not have a PAN list (identifying the name of caller and their relationship to Plaintiff) for some of the Plaintiffs, therefore, I am requesting the most frequently called numbers as indicated below. In cases in which IDOC produced a PAN list, that information is indicated below.

**Subpoenas to issue:**

1. Allen Jackson, 18 C 5121, 56 total calls made. I request 33 calls to (312) 933-6236 and 19 calls to (773) 430-0198.
2. Henry Thomas, 18 C 5131, 130 calls made. I request 104 calls to (773) 812-7484.
3. Philip Thomas, 18 C 5132, 8 calls made. I request them all.
4. Andre McNairy, 18 C 5127, 123 calls made. I request 78 calls to Danielle Barnett (friend) at (219) 318-7159 and 45 calls to Tina Patterson (sister) at (773) 879-6676.

**Calls that you possess:**

1. Clifford Roberts, 22 C 674, 836 calls made. I request 170 calls to Avis Roberts (mother-listed on Plaintiff's 26(a)'s) at (773) 707-9657. I request 114 calls to Darnell Poston (brother-listed on Plaintiff's 26(a)'s) at (773) 414-6940. I request 75 calls to Joseph

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Roberts (brother-listed on Plaintiff's 26(a)'s) at (402) 850-5899. I request 139 calls to (312) 808-0603.

2. Lionel White, Sr., 17 C 2877, 31 calls made. I request them all.

**Calls that I possess:**

1. Bobby Coleman, 19 C 1094, 10 calls made. I request permission to listen to all.
2. Milton Delaney, 19 C 1083, 330 calls made. I request permission to listen to 161 calls to (847) 782-8759 and 43 calls to (773) 933-7639.
3. William Carter, 17 C 7241, 162 calls made. I request permission to listen to 81 calls to (773) 640-9932 and 45 calls to (773) 329-9047.

I look forward to hearing from you soon, thank you.

By: /s/ Jason Marx  
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