

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

In re: WATTS COORDINATED	)	
PRETRIAL PROCEEDINGS	)	Master Docket Case No. 19-cv-01717
	)	
	)	Judge Andrea R. Wood
	)	
	)	Magistrate Judge Sheila M. Finnegan
	)	
	)	

THIS DOCUMENT RELATES TO CASE NO. 18 CV 5131

**ANSWERS TO DEFENDANT GEROME SUMMERS' INTERROGATORIES
TO PLAINTIFF HENRY THOMAS
IN CASE NO. 18 CV 5131**

Plaintiff Henry Thomas responds to Defendant Gerome Summers'

Interrogatories to Plaintiff as follows:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23. 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 work product or information protected by the attorney-client or other privileges, such as conversations that Plaintiff had with his attorneys or with mental health practitioners. Plaintiff further objects that the phrase “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 these objections, and without waiving Plaintiff's objections to this interrogatory, over the years, Plaintiff has 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 various family members on various occasions. He furthermore made statements to fellow Plaintiff/victims, including Ben Baker, Clarissa Glenn, and Jamar Lewis. He furthermore made statements to friends Patrick Frazier and Linda Owens. The general topic of the statements was to explain that Plaintiff was framed.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

A series of horizontal black bars of varying lengths, some solid and some dashed, arranged in a pattern that suggests a barcode or a stylized text representation. The bars are arranged in a sequence that could be interpreted as a binary code or a specific data format. The bars are arranged in a sequence that could be interpreted as a binary code or a specific data format. The bars are arranged in a sequence that could be interpreted as a binary code or a specific data format.

25. Identify with specificity all damages you are claiming in your lawsuit.

ANSWER: Plaintiff objects to the extent that this interrogatory calls for medical diagnoses and opinions that he is not qualified to offer. Plaintiff also objects to this interrogatory to the extent that it prematurely seeks expert discovery; Plaintiff will disclose non-privileged expert information as required by Rule 26 and

on the schedule established by the Court.

Plaintiff cannot presently quantify the extent of or provide a calculation of the total losses relating to all of his injuries in this case. Plaintiff intends to ask the jury to calculate his total losses, likely with the assistance of expert witnesses.

Subject to these and the general objections, and without waiving Plaintiff's objections to this interrogatory, as explained above, Plaintiff states that defendants framed him in two separate cases where he was convicted and has since been exonerated. In each instance, Plaintiff was deprived of the opportunity to interact with his loved ones; to be present for holidays, births, deaths and other life events; to pursue his passions and interests; to engage in meaningful labor and develop a career; to obtain an education; and to live freely, as an autonomous being.

Instead, during this time period, Plaintiff endured intermittent imprisonment in harsh, dangerous, and isolating conditions. He was intimidated and threatened in prison. The deprivation of Plaintiff's liberty was made more traumatic by Plaintiff's knowledge that he was innocent. Plaintiff has had, and continues to have, difficulty trusting people. He is anxious and feels worried when he is in large groups of people. Today, Plaintiff prefers to be alone, which is a significant departure from his social, jovial personality before his wrongful imprisonment. Plaintiff also continues to experience depression, trouble sleeping, and anxiety. In addition, he now has difficulty building and maintaining relationships with people. Plaintiff further states that the stress and trauma of his wrongful imprisonment has had, and will continue to have, emotional and physical

manifestations well into the future. Plaintiff's investigation into this matter continues and he reserves the right to supplement or modify this answer as new information comes to light.

Respectfully Submitted,

By: /s/Sean Starr
One of Plaintiffs' Attorneys

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