

EXHIBIT L

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

In re. Watts Coordinated Pretrial Proceedings)
)
)
) Case No.: 19-cv-1717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila Finnegan
)

THIS DOCUMENT RELATES TO CASE NO. 18CV05121

**PLAINTIFF ALLEN JACKSON'S ANSWERS TO DEFENDANT
ALVIN JONES' MENTAL HEALTH INTERROGATORIES**

Plaintiff Alexis Woods, as the administrator of the Estate of Allen Jackson, deceased,
by and through her attorneys, answers the following interrogatories on behalf of Allen Jackson
and pursuant to Rule 33 of the Federal Rules of Civil Procedure:

INTERROGATORIES

1. Are you claiming emotional damages as a result of the claims in your lawsuit?

If so, please describe the emotional damages.

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, and he anticipates that this may be the subject of expert discovery.

Subject to and without waiving Plaintiff's objections, Plaintiff answers yes. As a result of his false arrest and wrongful conviction, Mr. Jackson suffered from depression, experienced anger, hopelessness, and struggled with alcohol abuse.

-
- | Response | Percentage |
|---|------------|
| U.S. should take action | 71% |
| U.S. should not take action | 23% |
| U.S. should take action, but only if other countries do first | 6% |

[REDACTED]

[REDACTED]
 [REDACTED]
 [REDACTED]

- _____

11/11/2016

[REDACTED]
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Respectfully submitted,

/s/ Gianna Gizzi
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I, Gianna Gizzi, an attorney, hereby certify that on November 29, 2023, I caused a copy of the foregoing PLAINTIFF ALLEN JACKSON'S RESPONSES TO DEFENDANT JONES'S APRIL 14, 2020 INTERROGATORIES to be served on all counsel of record via email.

VERIFICATION

I, *Alexis Woods*, verify under penalty of perjury that I have reviewed the attached Answers to Defendant Officer Jones's Interrogatories, and I certify that the answers are true and correct to the best of my knowledge, information, and memory.

Date: Nov 29, 2023



Alexis Woods (Nov 29, 2023 10:08 CST)

Alexis Woods