

EXHIBIT M

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 5132

**ANSWERS TO DEFENDANT ELSWORTH SMITH'S INTERROGATORIES  
TO PLAINTIFF PHILLIP THOMAS  
IN CASE NO. 18 CV 5132**

Plaintiff Phillip Thomas responds to Defendant Gerome Summers' Interrogatories to Plaintiff as follows:

Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

1. Identify by name and address all health care professionals and/or facilities where you sought and/or received medical treatment for any physical and/or emotional injuries you claim in this case. Include dates for all visits.

**ANSWER:** Plaintiff 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.

Subject to these objections, Plaintiff states that he has visited a medical

Subject to these and the general objections, and without waiving Plaintiff's objections to this interrogatory, Plaintiff answers that he has spoken to federal investigators and/or prosecutors regarding alleged corruption and/or alleged misconduct by Chicago Police Officers. Specifically, Plaintiff spoke to investigators and/or attorneys with the United States Department of Justice on or around February 2018. The subject matter of the discussion related to Plaintiff's allegations that corrupt officers from the Chicago Police Department framed him and others for crimes they did not commit. Plaintiff, Plaintiff's attorneys, and representatives from the Department of Justice and Federal Bureau of Investigation were present at the meeting. To Plaintiff's knowledge, the meeting was not recorded.

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 normal 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