

EXHIBIT N

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: Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)

THIS DOCUMENT RELATES TO CASE NO. 19 cv 3316

**PLAINTIFF ANDRE MCNAIRY'S SUPPLEMENTAL ANSWERS TO
DEFENDANT ALVIN JONES'S MARCH 8, 2019 INTERROGATORIES**

ements his answers to Defendant Alvin Jones's



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without waiving these objections, Plaintiff answers that he was generally aware that people bought and sold controlled substances at Ida B. Wells.

8. Please describe all injuries (physical, emotional, or mental) you claim to have sustained as a result of the events giving rise to your Complaint.

SUPPLEMENTAL 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, leading to his wrongful conviction (from which he has now been exonerated), and physically mistreated during the arrest. Plaintiff was deprived of the opportunity to interact with his loved ones; to be present for holidays and family gatherings; to attend the funerals of beloved family members who died during his incarceration, including his sister, his niece, and the mother of his son; to pursue his passions and interests; to obtain an education and enroll in a job training program at Kennedy-King College so that he could develop a career; 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 while imprisoned. While incarcerated, he was physically assaulted by fellow inmates, contacted bacterial infections, injured his back, suffered terrible stomach pains, and endured inadequate health care 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 personality before his wrongful imprisonment. Plaintiff also experiences 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.

10. Please identify any and all employment you have had during the past

