

**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. 22-CV-00674

**PLAINTIFF CLIFFORD ROBERTS'
ANSWERS TO DEFENDANT ALVIN JONES' INTERROGATORIES**

Plaintiff, Clifford Roberts, answers Defendant Alvin Jones's Interrogatories to Plaintiffs who filed lawsuits after May 1, 2020 as follows:

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 to this interrogatory, Plaintiff answers yes. Plaintiff states that Defendants framed him, which led to his wrongful conviction,

from which he has now been exonerated. As a result of his 2003 arrest and subsequent conviction, Plaintiff was deprived of the opportunity to interact with his loved ones-including his child. Plaintiff further answers that this was the first time he was incarcerated for a significant period of time, therefore Plaintiff suffered depression, loss in appetite, and lack of sleep as a result of his 2003 arrest and subsequent conviction.

The deprivation of Plaintiff's liberty was made more traumatic by Plaintiff's knowledge that he was innocent. Consequently, Plaintiff developed anger issues and a distrust for authority. Plaintiff has been not been treated for his injuries.

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

2. Are you claiming any psychiatric, psychological, and/or emotional injuries as a result of the claims in your lawsuit? If so, please state:

- a. The name of any psychiatric, psychological, and/or emotional injuries claimed, and the name, address, and telephone number of each psychiatrist, physician, psychologist, therapist or other health care professional and facility rendering you treatment for each injury;
- b. Whether you had suffered any psychiatric, psychological, and/or any emotional injury prior to the date of the occurrence; and
- c. If the answer to (b) is yes, please state:
 - i. The duration of any psychiatric, psychological, and/or emotional injury you suffered; ii. Describe the nature of the psychiatric, psychological, and/or emotional injury; and iii. The name, address, and telephone number of each psychiatrist, physician, psychologist, therapist or other