

EXHIBIT Q

**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. 19-cv-1083

**PLAINTIFF MILTON DELANEY'S ANSWERS TO
DEFENDANT MANUEL LEANO'S INTERROGATORIES
IN CASE NO. 19-CV-1083**

Plaintiff Milton Delaney answers Defendant Manuel Leano's Interrogatories as follows:

ANSWERS

1. State your full name and all other names, nicknames or street names that you have ever used and every address you have lived at from January 1, 2001 to December 31, 2011.

ANSWER: Plaintiff objects to this interrogatory as overly broad, unreasonable, and harassing. Subject to these objections, Plaintiff answers that his full name is Milton Delaney Jr. He goes by the nickname “Pooh.” Plaintiff objects on privacy and relevance grounds to disclosure of his residential address. However, he is willing to discuss the production of such information, if Defendants produce this information for the same time period. Plaintiff’s investigation continues, and he reserves the right to

years prior to and 5 years subsequent to the events giving rise to your Complaint.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad, and seeks irrelevant information.

11. Are you claiming any psychiatric, psychological, and/or emotional injuries as a result of this occurrence? If so, please state:

- a. The name of any psychiatric, psychological, and/or emotional injury claimed, and the name and address of each psychiatrist, physician, psychologist, therapist or other health care professional rendering 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 dates of any psychiatric, psychological, and/or emotional injury and if the injury persists today;
 - ii. Describe the nature of the psychiatric, psychological, and/or emotional injury; and
 - iii. The name and address of each psychiatrist, physician, psychologist, therapist or other health care professional rendering treatment for each injury.

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.

Subject to and without waiving Plaintiff's objections to this interrogatory, the answer to this Interrogatory is yes. In summary, as explained above, Plaintiff states that Defendants framed him, leading to his wrongful conviction (from which he has now been exonerated). Plaintiff was deprived of the opportunity to interact with his loved ones, and other life events including births and deaths; to develop relationships and begin a family, 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. Plaintiff was furthermore isolated during his incarceration. 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 depressed, 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 has not been treated for all 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.

12. Please identify any and all employment you have had during the five years preceding your arrest to the present, including the name and address of the employer, your job responsibilities, your dates of employment, your hourly or weekly