

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 the Test Cases (Dkt. 393 ¶ 1)

LOEVY TEST-CASE PLAINTIFFS' SUPPLEMENTAL DISCLOSURES

Since the outset of this case, Plaintiffs have filed a series Rule 26(a)(1) disclosures and supplements thereto in the Coordinated Proceedings and in certain individual cases that later became part of the Coordinated Proceedings. The parties have now identified “test cases,” and this case is one of them. Dkt. 393.

For efficiency purposes, the Plaintiffs in test cases who are represented by Loevy & Loevy (“Loevy Test-Case Plaintiffs”) are providing this Supplemental Disclosure to identify witnesses they may rely on in support of their individual allegations who have not been previously disclosed by any of the parties in the Coordinated Proceedings. As before, the Loevy Test-Case Plaintiffs intend to call all Defendants as witnesses at trial, and they continue to reserve the right to rely on any witness disclosed by any other party in the Coordinated Proceedings (subject to limitations such as the 404(b) disclosures discussed below and in court filings). In addition, Test-Case Plaintiff specifically incorporate witnesses disclosed for any other Test-Case Plaintiffs who were listed on the same police reports as other Test-Case Plaintiffs (“co-arrestees”). In certain instances, third-party witnesses identified in these disclosures have been disclosed but not as a witness for the particular Plaintiff who they are associated with below.

Further, on February 8, 2023, the test-case Plaintiffs provided defense counsel with their list of proposed 404(b) witnesses. Those proposed 404(b) witnesses include the other test case Plaintiffs, Dkt. 393, and the following additional witnesses: Crystal Allen, Landon Allen, Jerome Bynum, Raynard Carter, William Crawford, Craig Colvin, Jerome Fears, Robert Forney, Willie Gaddy, Brian Hunt, Shaun James, Thomas Jefferson, Zarice Johnson, Arthur Kirksey, Jamar Lewis, Derrick Mapp, Bruce Powell, Willie Roberson, Frank Saunders, Taurus Smith, Isaac Weekly, Kimberly Watkins (Green), and Deon Willis. With the exception of Mr. Gaddy and Mr. Kirksey, each of these individuals are represented by the Loevy or Flaxman firms, and should be contacted through counsel. Mr. Kirksey should be contacted through his counsel Kellie Walters. Willie Gaddy can be contacted at [REDACTED].

Subject to the above, the Loevy Test-Case Plaintiffs make the following supplemental disclosures:

Coordinated Proceeding/Monell Witnesses

1. **Dennis M. Cooley** – Plaintiffs incorporate their earlier disclosure and provide the following updated contact information: [REDACTED], [REDACTED] -1966.
2. **COPA Investigator James L. Whitmer**, contact through counsel Matt Ryan, may have information about COPA's investigations regarding Plaintiffs' allegations.
3. **COPA Investigator Derek Dion**, contact through counsel Matt Ryan, may have information about COPA's investigations regarding Plaintiffs' allegations.
4. **COPA Investigator James L. Whitmer**, contact through counsel Matt Ryan, may have information about COPA's investigations regarding Plaintiffs' allegations.
5. **COPA Investigator Linda Wyatt**, contact through counsel Matt Ryan, may have information about COPA's investigations regarding Plaintiffs' allegations.
6. **Cook County State's Attorney ("CCSAO") Kimberly Foxx**, may have information about Plaintiffs' allegations regarding the alleged corrupt acts of Defendants and about the CCSAO's decision to seek to vacate Plaintiffs' convictions.
7. **Former Assistant Cook County State's Attorney Joseph Magats**, may have information about Plaintiffs' allegations regarding the alleged corrupt acts of Defendants

and about the CCSAO's decision to stop calling certain of the Defendants as witnesses in criminal prosecutions.

8. **Former Assistant Cook County State's Attorney Celeste Stack**, may have information about Plaintiffs' allegations Plaintiffs' allegations regarding the alleged corrupt acts of Defendants and about the CCSAO's decision to seek to vacate Plaintiffs' convictions.
9. **Office of Inspector General Investigator Jacob**, may have information about Plaintiffs' allegations and in particular about conversations with Fabio Valentini.
10. **Office of Inspector General Rebecca Riddick-Ostrovsky**, may have information about Plaintiffs' allegations and in particular about conversations with Fabio Valentini.

Chauncey Ali witnesses

1. **Alisa Broughton**, Mr. Ali's girlfriend, may have knowledge relating to his damages. She may be contacted through Plaintiff's counsel.
2. **Miosha Britzman**, the mother of Mr. Ali's son, may have information relating to his damages; [REDACTED]-1075.
3. **Richard Labrador** – Plaintiff's attorney for the underlying criminal matter, may have knowledge about those proceedings and Plaintiff's innocence; Law Office of the Cook County Public Defender, 69 W. Washington St. Ste. 1500, Chicago, Illinois 60602, (312) 603-0600.
4. **Unknown Assistant State's Attorney** – The individual who prosecuted Plaintiff in his underlying criminal case and thereby may have knowledge of Plaintiffs criminal proceedings in said case.

Ben Baker and Clarissa Glenn witnesses

5. **Officer/Lt. Cobbs** – This individual, also known as "Bat" or "Batman," may have information about Plaintiffs' allegations, including the discussion about his role that is reflected in the trial transcript from Mr. Baker's trial.

Bobby Coleman witnesses

1. **Erika Hill** – Plaintiff incorporates the earlier disclosure for this witness and adds the following contact information: [REDACTED]-9189.
2. **Daniel "Freng" (phonetic)** – This individual was one of Plaintiff's public defender for Case No. 03CR02644-01 and may have knowledge of Plaintiff's criminal prosecution, his innocence, and damages. Her current address and phone number are unknown.
3. **Unknown Assistant State's Attorney** – The individual who prosecuted Plaintiff in Case No. 03CR02644-01 and thereby may have knowledge of Plaintiffs criminal proceedings in said case.

Milton Delaney witnesses

1. **Mechelle Moody** – This individual may have information about Mr. Delaney's whereabouts around the time of his arrest, as well as his allegations that his arrest was wrongful; [REDACTED] -7171.

Leonard Gipson witnesses

1. **Velma Parker** – Plaintiff incorporates his earlier disclosure and provides the following contact information; [REDACTED] -6452.
2. **Theresa Gipson** – Plaintiff incorporates his earlier disclosure and notes that this witness can be contacted through Plaintiff's counsel.
3. **Demetrius Travis** – This witness is Plaintiff's father, who may have knowledge of Plaintiff Leonard Gipson's damages, as well as the circumstances surrounding his arrests. His current address is unknown and his phone number is [REDACTED] -5052.
4. **Victoria Ciszek** – This individual was one of the assistant state's attorneys who prosecuted Plaintiff in Case No. 03CR2644 and, and likely has knowledge of Plaintiff's criminal proceedings, including Plaintiff's motion to quash and suppress evidence as well as the corresponding hearing testimony. Her address and phone number are unknown.
5. **Robert Patterson** – This individual was one of the assistant state's attorneys who prosecuted Plaintiff in Case No. 03CR2644, and has knowledge of Plaintiff's criminal proceedings, including Plaintiff's motion to quash and suppress evidence as well as the corresponding hearing testimony. His address and phone number are unknown.

Tyrone Herron witnesses

1. **Tashana Jones** – Plaintiff's friend, who may have knowledge of Plaintiff's damages; [REDACTED] -0391.
2. **Richard Labrador** – Mr. Herron's attorney for the underlying criminal matter, may have knowledge about those proceedings and Mr. Herron's innocence; Law Office of the Cook County Public Defender, 69 W. Washington St. Ste. 1500, Chicago, Illinois 60602, (312) 603-0600.
3. **Timothy Carter** – Prosecutor assigned to the underlying criminal proceeding, may have knowledge regarding that proceeding; Carter & Opdycke Attorneys at Law P.C., 53 W. Jackson Blvd. Suite 928, Chicago, Illinois 60604-3467, (312) 635-0770.

Allen Jackson witnesses

1. **D'Andra Woods** – This individual is Mr. Jackson's brother and may have knowledge concerning Mr. Jackson's damages, as well as his own experiences and knowledge of Defendant Watts' misconduct. He can be contacted through counsel.

2. **Eva Woods** – This individual is Mr. Jackson’s mother and may have knowledge concerning Mr. Jackson’s damages, as well as any statements she gave to COPA regarding Mr. Jackson’s allegations. She can be contacted through Plaintiff’s counsel.
3. **Shamika Booker** – Plaintiff incorporates Allen Jackson’s previous disclosure and provides the following contact information; [REDACTED] [REDACTED]. Telephone number is unknown.
4. **Roy “Shock” Bennett** – Plaintiff incorporates his Allen Jackson’s disclosure and provides the following contact information; [REDACTED] [REDACTED]. Telephone number is unknown.
5. **Rosalyn Morris** – This witness may have knowledge concerning damages, as well as information concerning Defendant Watts and his team’s misconduct; [REDACTED] [REDACTED] -0198.
6. **Patrick Boyle** – Allen Jackson’s criminal defense attorney in Case No. 06CR3375, and thus may have knowledge of the criminal proceedings in said case and information about Plaintiff’s previous encounters with Defendants; 155 North Michigan Avenue, Suite 562, Chicago, IL 60601, (312) 565-2888
7. **Kevin Hughes** – This individual is the assistant state’s attorney who prosecuted Allen Jackson in Case No. 06CR3375 and thereby may have knowledge of Mr. Jackson’s criminal proceedings in said case; Cook Country States Attorney, 2650 S California Ave, Chicago, Illinois 60608-5146, (847) 409-5720
8. **COPA investigators/former investigators James Whitmer, Derek Dion, Gregory Masters, and Anthony Beckneck** – These individuals may have knowledge of their interview of Allen Jackson relating to his allegations. They may be contacted through COPA’s counsel, Matt Ryan.

Larry Lomax witnesses

1. **Roscoe Bryson** – This individual worked as a janitor in the Ida B. Wells Housing Complex in or around January 2003, and thus may have knowledge of his observations of Plaintiff’s arrest, as well as the surrounding circumstances. Additionally, he testified at Plaintiff Leonard Gipson’s motion to quash and suppress hearing on January 14, 2004. This witness may also be able to testify to any knowledge he may have about Defendants. His last known address is [REDACTED] -5844.
2. **Sylvia Lomax** - This witness is Plaintiff’s sister and may have knowledge concerning Plaintiff’s damages. She can be contacted through Plaintiff’s counsel.
3. **Genevieve Waldschmidt, APRN** – This individual is Plaintiff’s general practitioner and may have knowledge of his damages, including Plaintiff’s physical injuries, conditions, and ailments relating to his January 2003 arrest, along with any corresponding treatment. This witness will also be able to testify to her experience, education, and qualifications as a medical professional; Lake County Community Health Center, 2400 Belvidere Road, Waukegan, Illinois 60085.

4. **Mamerto Villamonte, DDS** – This individual may have knowledge of Plaintiff's dental conditions and treatments stemming from/relating to his January 2003 arrest. He will also be able to testify to his experience, education, and qualifications as a medical professional; Lake County Community Health Center, 2400 Belvidere Road, Waukegan, Illinois 60085.
5. **Irina Bolotnikova, DDS** – This individual may have knowledge of Plaintiff's dental conditions and treatments stemming from/relating to his January 2003 arrest. She will also be able to testify to her experience, education, and qualifications as a medical professional; Lake County Community Health Center, 2400 Belvidere Road, Waukegan, Illinois 60085.
6. **Dr. Rajiv Kumar Verma** – This individual may have knowledge of Plaintiff's damages, including Plaintiff's physical injuries, conditions, and ailments relating to his January 2003 arrest, along with any corresponding treatment. This witness will also be able to testify to his experience, education, and qualifications as a medical professional; 7900 Rollins Rd., Suite 1400 Gurnee, IL 60031, (847) 866-7846.

Octayvia McDonald witnesses

1. **Calvin Jenkins** – This individual may have information about the facts and circumstances of his arrest on May 25, 2005, including the identity of the officers involved in his arrest. Contact information is unknown.
2. **Danielle Pertiller, LCPC**: Plaintiff's therapist; she has knowledge of Plaintiff's damages. Chicago Department of Public Health, Englewood Mental Health Clinic, 641 W. 63rd St., Chicago, IL 60621; 312-745-0625 or 312-747-7496.
3. **Dan Tsataros**: This individual was Plaintiff's attorney at her plea hearing in the underlying criminal case and may have knowledge of the facts and circumstances of her arrest, criminal proceedings, and innocence; Law Offices of Dan Tsataros, 800 South Wells Street Unit D33, Chicago, Illinois 60607, (773) 991-7607

Andre McNairy witnesses

1. **Reginald Patterson** – This individual is Plaintiff's nephew and may have information relating to his damages.
Plaintiff also expressly incorporates his identification of the following witnesses who may have knowledge of the damages that Plaintiff has suffered and who he disclosed (along with known contact information) in response to Defendant Alvin Jones's Interrogatories on May 6, 2019.
 - a. Shenaya Patterson: niece;
 - b. Jacqueline Patterson: niece;
 - c. Anton Smith: friend.
 - d. Deanna Young: friend and former girlfriend.

Clifford Roberts witnesses

1. **Roscoe Bryson** – This individual worked as a janitor in the Ida B. Wells Housing Complex in or around January 2003, and thus may have knowledge of his observations of Plaintiff's arrest, as well as the surrounding circumstances. Additionally, he testified at Plaintiff Leonard Gipson's motion to quash and suppress hearing on January 14, 2004. This witness may also be able to testify to any knowledge he may have about Defendants. His last known address is [REDACTED] -5844.
2. **Darnell Poston** – This witness is Plaintiff's brother and may have knowledge concerning Plaintiff's damages. He can be contacted through Plaintiff's counsel.
3. **Ades Roberts** – This is Plaintiff's mother, who he was living with in Ida B. Wells in January 2003, and may have knowledge of Plaintiff's damages, as well as certain Defendants' misconduct. She can be contacted through Plaintiff's counsel.
4. **Ava Poston** – This individual is Plaintiff's sister, who may be able to testify to Plaintiff's damages. She can be contacted through Plaintiff's counsel.
5. **Unknown Public Defender** – Plaintiff's public defender for Case No. 03CR2644 likely has knowledge of the circumstances surrounding Plaintiff's arrest and wrongful conviction. Contact information is unknown.
6. **Unknown Assistant State's Attorney** – The assistant state's attorney who prosecuted Plaintiff in Case No. 03CR2644 likely has knowledge of Plaintiff's criminal proceedings and the resulting conviction. Contact information is unknown.
7. **Gregory Masters** – This individual was one of the COPA investigators who interviewed Plaintiff about his January 2003 false arrest and his allegations about Defendants, and may be able to testify to the same. He may be contacted through Matt Ryan, counsel for COPA.

Henry Thomas witnesses

1. **Anthony Thomas** – This is one of Plaintiff's brothers who may have knowledge of Plaintiff's damages, as well as the circumstances surrounding his false arrests and the subsequent convictions; [REDACTED] -5987.
2. **Crystal Hammond** – This is Plaintiff's sister who may have knowledge of Plaintiff's damages, as well as the circumstances surrounding his false arrests and the subsequent convictions; [REDACTED] -0556.
3. **Linda Owens** – This is Plaintiff's former girlfriend, who may have knowledge of his damages and the circumstances surrounding Plaintiff's false arrests and the subsequent convictions; [REDACTED] -7484.
4. **Cameo Potts** – Plaintiff incorporates his earlier disclosure and provides the following contact information; [REDACTED]. His phone number is unknown at this time.

5. **Antion Payton** – Plaintiff incorporates his earlier disclosure and provides the following contact information; [REDACTED]. His phone number is unknown at this time.
6. **Terrell Williams** – This is one of Plaintiff's co-defendants/co-arrestees, who may have knowledge of the circumstances surrounding his own and Plaintiff's November 9, 2006 arrests, as well as their interactions with certain Defendant Officers; [REDACTED]. His phone number is unknown.
7. **Mcclinnon Smith** – This is one of Plaintiff's co-arrestees, who may have knowledge of the circumstances surrounding his own and Plaintiff's November 9, 2006 arrests, as well as their interactions with certain Defendant Officers; [REDACTED]. His phone number is unknown.
8. **Jeffrey Brown** – Plaintiff incorporates his earlier disclosure and provides the following contact information; [REDACTED]. His phone number is currently unknown.
9. **Alfreda Pritchett** – Plaintiff incorporates his earlier disclosure and provides the following contact information; [REDACTED]. Her phone number is unknown.
10. **Gerard Butler** – Plaintiff incorporates his earlier disclosure and provides the following contact information; [REDACTED]. His phone number is unknown.
11. **Frank Marek** – This individual was the assistant state's attorney who prosecuted Plaintiff in Case No. 07CR421, and likely has knowledge of Plaintiff's criminal proceedings and the resulting conviction. Contact information is unknown.
12. **Unknown Public Defender(s)** – Plaintiff's public defenders for Case Nos. 03CR04666 and 07CR00421 likely have knowledge of Plaintiff's criminal proceedings that stemmed from both false arrests, and the circumstances surrounding Plaintiff's arrests and wrongful convictions. Contact information is unknown.

Phillip Thomas witnesses

Plaintiff provides updated contact information for the following previously disclosed witnesses:

1. **Vanessa Thomas** – [REDACTED] -4567.
2. **Brenayder Williams** – [REDACTED] -9791.
3. **Tiesha Williams** – [REDACTED] -2980.
4. **Aleon Thomas** – [REDACTED] -9575.
5. **Cindy Thomas** – [REDACTED] -5053.

Lionel White Sr. witnesses

1. **Lucille Collins** – This witness may be able to testify about Plaintiff's damages, and any of her knowledge about and observations of Defendants.
2. **Vicki Ollie** – This witness was an Ida B. Wells tenant whose apartment was searched by officers working under the supervision of Watts on April 24, 2006, and thus may have knowledge of Defendant Officers' conduct that day. Her address and phone number are unknown.
3. **Michelle Green** – This witness was one of the nurses at Provident Hospital who examined Plaintiff on April 24, 2006, after his encounter with Defendants, and thus will likely be able to testify to her observations of Plaintiff, knowledge of his injuries, and related matters. This witness will also testify to her experience, education, and qualifications as a medical professional; [REDACTED]
[REDACTED]-2000.
4. **Laura Colbert** – This witness was one of the nurses at Provident Hospital who examined Plaintiff on April 24, 2006, after his encounter with Defendants, and thus will likely be able to testify to her observations of Plaintiff, knowledge of his injuries, and related matters. This witness will also testify to her experience, education, and qualifications as a medical professional; [REDACTED]-2000.
5. **Dr. Isaac Plamoottil** – Attending Physician at Provident Hospital on April 24, 2006, who may have knowledge of his interactions with Plaintiff, as well as his observations, treatment, and diagnoses of Plaintiff on the date of incident. This witness will also be able to testify to his experience, education, and qualifications as a medical professional; 8012 South Crandon, Chicago, Illinois 60617.
6. **Dr. Sergio Rodriguez** – This individual was the intake physician at Cermak Health Services on or around April 25, 2006 when Plaintiff was brought to Cermak, and thus will likely be able to testify to his observations of Plaintiff, knowledge of his injuries, and related matters. This witness will also be able to testify to his experience, education, and qualifications as a medical professional; 2800 S California Ave., Chicago, Illinois 60608, (773) 674-7488.
7. **Kevin Ochalla** – This individual was one of Plaintiff's assistant public defenders during his criminal proceedings in Case No. 06CR1209201, and may have knowledge of the circumstances surrounding Plaintiff's false arrest and the resulting criminal charges and prosecution; 2650 S. California Ave. Chicago, Illinois 60608, (773) 674-6989.
8. **Judge Terence McCarthy** – This individual was one of Plaintiff's assistant public defenders during his criminal proceedings in Case No. 06CR1209201, and may have knowledge of the circumstances surrounding Plaintiff's false arrest and the resulting criminal charges and prosecution; 1500 Maybrook Dr., Rm. 144, Maywood, Illinois 60153, (708) 865-6060.
9. **Daniel Tiernan** – This individual prosecuted Plaintiff in Case No. 06CR1209201 and thereby may have knowledge of Plaintiff's criminal proceedings in said case. His address and phone number are unknown.
10. **Cheryl Smith** This individual worked for the Office of Professional Standards ("O.P.S.") and may have knowledge of Plaintiff's complaint with O.P.S., the role she played in the

O.P.S. investigation, and other information about Defendants. Her address and telephone number are currently unknown.

- 11. Sharone Williams** This individual registered Plaintiff's complaint with the Office of Professional Standards ("O.P.S.") and may have knowledge of Plaintiff's complaint with O.P.S. Her address and telephone number are currently unknown.
- 12. Cleothus Morris** – According to police reports, Morris was arrested at the same location at or near the same time as Plaintiff and may have knowledge about the circumstance of that arrest and of Plaintiff's arrest. Address and telephone number are currently unknown.
- 13. Thomas Mitchell** – According to police reports, Mitchell was arrested at the same location at or near the same time as Plaintiff and may have knowledge about the circumstance of that arrest and of Plaintiff's arrest. Address and telephone number are currently unknown.
- 14. Teresa Butler** – According to police reports, Butler was arrested at the same location at or near the same time as Plaintiff and may have knowledge about the circumstance of that arrest and of Plaintiff's arrest. Address and telephone number are currently unknown.
- 15. Charlie Riley** – According to police reports, Riley was arrested at the same location at or near the same time as Plaintiff and may have knowledge about the circumstance of that arrest and of Plaintiff's arrest. Address and telephone number are currently unknown.
- 16. Lynn Howard** – According to police reports, Howard was arrested at the same location at or near the same time as Plaintiff and may have knowledge about the circumstance of that arrest and of Plaintiff's arrest. Address and telephone number are currently unknown.
- 17. John Pierce** – Plaintiff incorporates the earlier disclosure for this witness and adds the following contact information: [REDACTED] - 3527.
- 18. Timothy Brown** – Plaintiff incorporates the earlier disclosure for this witness and adds the following contact information: [REDACTED] - 6720.
- 19. George Green** – Plaintiff incorporates the earlier disclosure for this witness and adds the following contact information: [REDACTED] - 9283

Respectfully submitted,

/s/ Scott Rauscher
One of Plaintiffs' Attorneys

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CERTIFICATE OF SERVICE

I, Scott Rauscher, an attorney, certify that April 6, 2023, I caused to be served a copy of Loevy Test-Case Plaintiffs' Supplemental Disclosures on all counsel of record via electronic mail.

/s/ Scott Rauscher _____