

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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|--|---|--|
| COORDINATED CASES                                      | ) |  |
|  | ) |  |
| <i>Baker v. Chicago et al.</i> , No. 16-cv-8940        | ) | No. 16-CV-8940                                 |
| <i>White v. Chicago et al.</i> , No. 17-cv-2877        | ) |  |
| <i>Powell v. Chicago et al.</i> , No. 17-cv-5156       | ) | Honorable Judge Andrea R. Wood                 |
| <i>Carter v. Chicago et al.</i> , No. 17-cv-7241       | ) | and Honorable Magistrate Judge Sheila Finnegan |
| <i>Forney v. Chicago et al.</i> , No. 18-cv-3474       | ) |  |
| <i>Shenault v. Chicago et al.</i> , No. 18-cv-3477     | ) |  |
| <i>Shenault Jr. v. Chicago et al.</i> , No. 18-cv-3478 | ) |  |
| <i>Gibbs v. Chicago, et al.</i> , No. 18-cv-5119       | ) |  |
| <i>Gipson v. Chicago, et al.</i> , No. 18-cv-5120      | ) |  |
| <i>Jackson v. Chicago, et al.</i> , No. 18-cv-5121     | ) |  |
| <i>Sanders v. Chicago, et al.</i> , No. 18-cv-5122     | ) |  |
| <i>James v. Chicago, et al.</i> , No. 18-cv-5123       | ) |  |
| <i>Jefferson v. Chicago, et al.</i> , No. 18-cv-5124   | ) |  |
| <i>Saunders v. Chicago, et al.</i> , No. 18-cv-5125    | ) |  |
| <i>McDaniels v. Chicago, et al.</i> , No. 18-cv-5126   | ) |  |
| <i>McNairy v. Chicago, et al.</i> , No. 18-cv-5127     | ) |  |
| <i>Scott v. Chicago, et al.</i> , No. 18-cv-5128       | ) |  |
| <i>Rainey v. Chicago, et al.</i> , No. 18-cv-5129      | ) |  |
| <i>Smith v. Chicago, et al.</i> , No. 18-cv-5130       | ) |  |
| <i>Thomas v. Chicago, et al.</i> , No. 18-cv-5131      | ) |  |
| <i>Thomas v. Chicago, et al.</i> , No. 18-cv-5132      | ) |  |
| <i>White, Jr. v. Chicago, et al.</i> , No. 18-cv-5133  | ) |  |
| <i>Jefferson v. Chicago et al.</i> , No. 18-cv-8182    | ) |  |
| <i>Blair v. Chicago et al.</i> , No. 19-cv-0127        | ) |  |
| <i>Curtis v. Chicago et al.</i> , No. 19-cv- 0128      | ) |  |
| <i>Henderson v. Chicago, et al.</i> , No. 19-cv-0129   | ) |  |
| <i>Ollie v. Watts et al.</i> , No. 19-cv-0131          | ) |  |
| <i>Wilbourn v. Chicago et al.</i> , No. 19-cv-0132     | ) |  |
| <i>Thomas v. Chicago et al.</i> , No. 19-cv-0133       | ) |  |
|  | ) |  |
| Plaintiffs,  | ) |  |
| v.   | ) |  |
|  | ) |  |
| CITY OF CHICAGO, <i>et al.</i> ,                       | ) |  |
|  | ) |  |
| Defendants   | ) |  |
|  | ) |  |
|  | ) |  |
|  | ) |  |
|  | ) |  |

**COORDINATED PLAINTIFFS' FEBRUARY 4, 2019**  
**RULE 26(a)(1) DISCLOSURES**

**In addition to the individuals previously disclosed in the *Baker and White Sr.* cases, Plaintiffs in the coordinated cases hereby make the following disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1):**

**i.** The following people are likely to have discoverable information that Plaintiffs may rely on to support their claims:

1. Ben Baker, Plaintiff, can be reached through Plaintiff's counsel.
2. Clarissa Glenn, Plaintiff, can be reached through Plaintiff's counsel.
3. Lionel White Sr., Plaintiff, can be reached through Plaintiff's counsel.
4. Bruce Powell, Plaintiff, can be reached through Plaintiff's counsel.
5. William Carter Plaintiff, can be reached through Plaintiff's counsel.
6. Robert Forney, Plaintiff, can be reached through Plaintiff's counsel.
7. Angelo Shenault, Plaintiff, can be reached through Plaintiff's counsel.
8. Angelo Shenault Jr., Plaintiff, can be reached through Plaintiff's counsel.
9. Marcus Gibbs, Plaintiff, can be reached through Plaintiff's counsel.
10. Leonard Gipson, Plaintiff, can be reached through Plaintiff's counsel.
11. Jamell Sanders, Plaintiff, can be reached through Plaintiff's counsel.
12. Shaun , Plaintiff, can be reached through Plaintiff's counsel.
13. Thomas Jefferson, Plaintiff, can be reached through Plaintiff's counsel.
14. Frank Saunders, Plaintiff, can be reached through Plaintiff's counsel.
15. Anthony McDaniels, Plaintiff, can be reached through Plaintiff's counsel.
16. Andre McNairy, Plaintiff, can be reached through Plaintiff's counsel.
17. Christopher Scott, Plaintiff, can be reached through Plaintiff's counsel.
18. Lee Rainey, Plaintiff, can be reached through Plaintiff's counsel.
19. Taurus Smith, Plaintiff, can be reached through Plaintiff's counsel.
20. Henry Thomas, Plaintiff, can be reached through Plaintiff's counsel.
21. Phillip Thomas, Plaintiff, can be reached through Plaintiff's counsel.
22. Lionel White, Jr., Plaintiff, can be reached through Plaintiff's counsel.
23. Goleather Jefferson Plaintiff, can be reached through Plaintiff's counsel.
24. Harvey Blair Plaintiff, can be reached through Plaintiff's counsel.
25. Joshua Curtis, Plaintiff, can be reached through Plaintiff's counsel.
26. Rickey Henderson, Plaintiff, can be reached through Plaintiff's counsel.
27. George Ollie, Plaintiff, can be reached through Plaintiff's counsel.
28. Vondell Wilbourn, Plaintiff, can be reached through Plaintiff's counsel.

29. Nephus Thomas, Plaintiff, can be reached through Plaintiff's counsel.

Plaintiffs have information pertaining to the corruption, extortion, robberies, drug dealing, illegal gun trade, and physical and psychological violence perpetuated by Defendant Ronald Watts and his tactical team, as well as the circumstances surrounding Plaintiffs' false arrests, their criminal prosecution and wrongful convictions and incarceration, and the resulting injuries they sustained from these events.

30. Ronald Watts, Defendant, can be reached through counsel.
31. Kallatt Mohammed, Defendant, can be reached through counsel.
32. Alvin Jones, Defendant, can be reached through counsel.
33. Elsworth Smith Jr., Defendant, can be reached through counsel.
34. Kenneth Young, Jr., Defendant, can be reached through counsel.
35. Lamonica Lewis, Defendant, can be reached through counsel.
36. Robert Gonzalez, Defendant, can be reached through counsel.
37. Douglas Nichols, Defendant, can be reached through counsel.
38. Manuel Leano, Defendant, can be reached through counsel.
39. Brian Bolton, Defendant, can be reached through counsel.
40. Calvin Ridgell, Defendant, can be reached through counsel.
41. George Summers, Defendant, can be reached through counsel.
42. Michael Spargaaren, Defendant, can be reached through counsel.
43. Darrel Edwards, Defendant, can be reached through counsel.
44. Matthew Cadman, Defendant, can be reached through counsel.
45. Lt. Michael J. Stevens, Defendant, can be reached through counsel.
46. Miguel Cabrales, Defendant, can be reached through counsel.
47. John Griffin, Defendant, can be reached through counsel.
48. D. Soltis, Defendant, can be reached through counsel.
49. Ronald Heard, Defendant, can be reached through counsel.
50. Darryl Akins, Defendant, can be reached through counsel.
51. Katherine Moses-Hughes, Defendant, can be reached through counsel.
52. Officer Lane, Defendant, can be reached through counsel.
53. Officer Bogard, Defendant, can be reached through counsel.
54. Sergeant J. Bostak, Defendant, can be reached through counsel.
55. Sergeant L. Panepinto, Defendant, can be reached through counsel.
56. Sergeant E.A. Richards, Defendant, can be reached through counsel.
57. Sergeant Jose Lopez, Defendant, can be reached through counsel.
58. Mike Ryle, Defendant, can be reached through counsel.
59. Edward Griffin, Defendant, can be reached through counsel.
60. Philip Cline, Defendant, can be reached through counsel.
61. Karen Rowan, Defendant, can be reached through counsel.

62. Debra Kirby, Defendant, can be reached through counsel.

Defendants may have information concerning the unconstitutional and unlawful acts perpetuated by Defendant Ronald Watts and other Defendants, including: the role Defendants played in the illegal drug trade at the Ida B. Wells public housing development during the late 1990s through early 2012; the systematic fabrication of evidence and creation of false and fraudulent police reports; the corruption, extortion, robberies, drug dealing, illegal gun trade, and the physical and psychological violence perpetuated by Defendant Ronald Watts and his tactical team; murders during the late 1990s into early 2012; Plaintiffs' wrongful arrests and convictions; Defendants' contact, conversations, and other communications with Plaintiffs; Defendants' contact, conversations, and other communications with witnesses relating to Plaintiffs; fabrication of police reports and other records documenting the investigations of Plaintiffs and others; falsely testifying in courtrooms and in front of grand juries; promoting and participating in the criminal prosecution of Plaintiffs and others; and concealing material and exculpatory evidence concerning Defendant Ronald Watts's and his team's criminal empire both during the criminal proceedings and after Plaintiffs' and others' wrongful convictions.

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The following witnesses may have knowledge as to Defendant Watts's and his team's pattern of engaging in unconstitutional and unlawful conduct, particularly involving Defendant Watts's and his team's framing, false arrests, and wrongful convictions of innocent these witnesses:

63. Zarice Johnson – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

64. Theodore “Ed” Wilkins – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

65. Bobby Coleman – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

66. Larry Lomax – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

67. Mister Lucky Pearson – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

68. Deon Willis – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

69. Martez Wise – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

70. Cordero Payne – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

71. Kim Wilbourn – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

72. George Almond – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

73. Alvin Waddy – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

74. Deandre Bell – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

75. Landon Allen – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

76. James Moore – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

77. Gregory Warren – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

78. Tyronne Fenton – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

79. Gregory Dobbins – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

80. Russ Lipscomb – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

81. Milton Delaney – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

82. Brian Hunt – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

83. Cleon Glover – see Baker GLENN 28757-29109. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

84. Leonard Sanders – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

85. Herbert Anderson – see Baker GLENN 28757-29109. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

86. Willie Martin – see Baker GLENN 29975-30544. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

87. Octayvia McDonald – see Baker GLENN 29975-30544. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

88. Sean Bush – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

89. Christopher Jones – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

90. Derrick Lewis – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

91. Anthony Mays – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

92. Isaac Weekly – see Baker GLENN 29975-30544. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

93. Joseph Roberts – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

94. Bobby Coleman – see Baker GLENN 29975-30544. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

95. Stefon Harrison – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

96. Raynard Carter – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

97. Darron Byrd – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

98. Lapon Thompson – see Baker GLENN 29975-30544. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900

99. Sydney Harvey – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

100. Lloyd Newman – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

101. Anthony Harris – see Baker GLENN 29975-30544. Can be reached through his counsel, Josh Tepfer, Exoneration Project.

102. Kenneth Hicks – see Baker GLENN 29975-30544. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

103. Craig Colvin – see Baker GLENN 29975-30544. Can be reached through his counsel at Loevy & Loevy - 311 N. Aberdeen, Third Floor, Chicago, Illinois (312) 243-5900.

104. David Holmes – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

105. Gregory Haynes – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

106. Torrence Ivory – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

107. Deonta Anderson – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

108. Alhumma Stokes – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

109. LeRoy Williams – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

110. Hasaan Potts – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

111. Jajaun Nile – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

112. Lakiya Gresham – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

113. Oliver Sims – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

114. Dorian Wells – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

115. Antwan Bradley – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

116. Eson Claybron – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

117. Darnell Howard – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

118. Javon Bradley – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

119. Joshua King – Can be reached through his counsel, Josh Tepfer, Exoneration Project.



120. Terrance Hogan – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

121. Rasaan Shannon – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

122. Kimberly Watkins – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

123. Marc Giles – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

124. Darryl Hall – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

125. Stephen Shelton – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

126. Tyree Smith – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

127. Teshama Beal – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

128. Darryl Boyd – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

129. Jimmie Bell – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

130. Joseph Wright – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

131. Sherman Johnson – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

132. Sherman Lewis – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

133. Elgen Moore – Can be reached through his counsel, Josh Tepfer, Exoneration Project.

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The following witnesses may have knowledge as to Defendant Watts's and his team's pattern of engaging in unconstitutional and unlawful conduct:

134. Willie Gaddy – Address/phone number currently unknown.
135. Daniel Hopkins – Address/phone number currently unknown.
136. Jerome Fears – Address/phone number currently unknown.
137. Arthur Kirksey – Address/phone number currently unknown.
138. Stacy Graham – [REDACTED]-6938 – Address currently unknown.
139. Lolita Claybron – Address/phone number currently unknown. See CR 1017012.
140. Deaonte Claybron – Address/phone number currently unknown. See CR 1017012.
141. Debra Gustard – Address/phone number currently unknown. See CR 1017012.
142. Derek Clay – Address/phone number currently unknown. See CR 313523.
143. Charles Rogers – Address/phone number currently unknown. See CR 1031334.
144. Derrick Collins – Address/phone number currently unknown. See CR 1031334.
145. Marcus Williams – Address/phone number currently unknown. See CR 254205.
146. Alexis Sugges – Address/phone number currently unknown. See CR 258817.
147. Ricardo Burns – Address/phone number currently unknown. See CR 260658.
148. Joseph Sylles – Address/phone number currently unknown. See CR 260658.
149. Kenneth Haymn – Address/phone number currently unknown. See CR 263095.
150. Latanya Book (Haymon) – Address/phone number currently unknown. See CR 263095.
151. Sonia Booth – Address/phone number currently unknown. See CR 263095.
152. Isaac Thorne – Address/phone number currently unknown. See CR 263459.
153. Brenetta Stephenson – Address/phone number currently unknown. See CR

274930.

154. Rodney Campbell – Address/phone number currently unknown. See CR 274930.
155. Roderick Vasser – Address/phone number currently unknown. See CR 274930.
156. Sandra Baker – Address/phone number currently unknown. See CR 287011.
157. Beverly McKnight – Address/phone number currently unknown. See CR 298336.
158. Alphonso Coleman – Address/phone number currently unknown. See CR 298336.
159. Faye Wilson – Address/phone number currently unknown. See CR 300175.
160. Angela Dixon – Address/phone number currently unknown. See CR 301221.
161. Jerome Bynum – Address/phone number currently unknown. See CR 301221.
162. Garold Brown – Address/phone number currently unknown. See CR 303646.
163. Kevin Ross – Address/phone number currently unknown. See CR 305723.
164. Natayvia McDonald – Address/phone number currently unknown. See CR 305849.
165. Pamela Nooner – Address/phone number currently unknown. See CR 305849.
166. Gresandra Shumaker – Address/phone number currently unknown. See CR 305849.
167. Vincent Randle – Address/phone number currently unknown. See CR 305849.
168. Eana Adams – Address/phone number currently unknown. See CR 305849.
169. Erica Johnson – Address/phone number currently unknown. See CR 305849.
170. Ebony Johnson – Address/phone number currently unknown. See CR 305849.
171. Charles Pictures – Address/phone number currently unknown. See CR 305849.
172. Eric Finley – Address/phone number currently unknown. See CR 311300.
173. Cicero Patton – Address/phone number currently unknown. See CR 311300.
174. Shawn Hyche – Address/phone number currently unknown. See CR 314992.

175. Cornelia Lucas – Address/phone number currently unknown. See CR 1004698.
176. Terra Johnson Bell – Address/phone number currently unknown. See CR 1005766.
177. Eric Davis – Address/phone number currently unknown. See CR 1005855.
178. Curtis Camp – Address/phone number currently unknown. See CR 1014553.
179. Terrell Champagne – Address/phone number currently unknown. See CR 1008820.
180. Annitra Nix – Address/phone number currently unknown. See CR 1008820.
181. Darlene Key – Address/phone number currently unknown. See CR 1008820.
182. Tatiana Blackburn – Address/phone number currently unknown. See CR 1008820.
183. Lawrence Jackowiak – Address/phone number currently unknown. See CR 1028854.
184. Michael Kassim – Address/phone number currently unknown. See CR 1026056.
185. Shawana Tarbor – Address/phone number currently unknown. See CR 1029004.
186. Zaron Graham – Address/phone number currently unknown. See CR 1029004.
187. Mable Price – Address/phone number currently unknown. See CR 1030958.
188. Dominique Horton – Address/phone number currently unknown. See CR 1030958.
189. Corey Davis – Address/phone number currently unknown. See CR 1030009.
190. Willie Houston – Address/phone number currently unknown. See CR 1030009.
191. Ann Ware – Address/phone number currently unknown. See CR 1030009.
192. Marjora Houston – Address/phone number currently unknown. See CR 1030009.
193. Sandy Johnson – Address/phone number currently unknown. See CR 1046046.
194. Marvin Mosley – Address/phone number currently unknown. See CR 1053673.
195. Lewis Williams – Address/phone number currently unknown. See CR 1059446.

196. Amanda Parker – Address/phone number currently unknown. See CR 284536.
197. Bekenya Coker – Address/phone number currently unknown. See CR 284602.
198. Rochelle Garth – Address/phone number currently unknown. See CR 296428.
199. Marquita Cooper– Address/phone number currently unknown. See CR 273870.
200. Wilbert Kellogg – Address/phone number currently unknown. See CR 273870.
201. Shirely Wallace – Address/phone number currently unknown. See CR 273870.
202. Charles Butler – Address/phone number currently unknown. See CR 1012897.
203. Kelvin Lawrence – Address/phone number currently unknown. See CR 1037238.
204. Kevin Jones – Address/phone number currently unknown. See CR 1037238.
205. Yolanda Willis – Address/phone number currently unknown. See CR 1037238.
206. Jakharri Washington – Address/phone number currently unknown. See CR 1044250.
207. Charles Lawrence – Address/phone number currently unknown.
208. Rasheed Brakes – Address/phone number currently unknown.
209. Kimberly Collins – Address/phone number currently unknown.
210. Delores Allen – Address/phone number currently unknown.
211. Marquite Moore – Wilbert Moor’s sister – [REDACTED]-2290; Address currently unknown.
212. Charlene Campbell – Address/phone number currently unknown.
213. Lashina Weekly – Address/phone number currently unknown.
214. Anthony Stroud – Address/phone number currently unknown.
215. Charles Wicks –Address/phone number currently unknown.
216. LeRoy McCambry – Address/phone number currently unknown.
217. James McGee – Address/phone number currently unknown.

218. Akira Reynolds – Address/phone number currently unknown.
219. Christolth Washington – Address/phone number currently.
220. Ciera Clark –Address/phone number currently unknown.
221. Qiana Clark Marble – Address/phone number currently unknown.
222. Sandra Clark –Address/phone number currently unknown.
223. Winnie Lewis – Address/phone number currently unknown.
224. Avis Roberts – Address/phone number currently unknown.
225. Orlando MacIntosh – Address/phone number currently unknown.
226. Siobahn Thompson – Address/phone number currently unknown.
227. Dawn King – Address/phone number currently unknown.
228. Rashad Shannon – Address/phone number currently unknown.
229. Gregory Young, Sr. – Address/phone number currently unknown.
230. Latrice Harris – Address/phone number currently unknown.
231. Vanessa King – Address/phone number currently unknown.
232. Vinson Khary Willis – Address/phone number currently unknown.
233. Tennyson Gibson – Address/phone number currently unknown.
234. Kenny Jackson – Address/phone number currently unknown.
235. Michelle Shaw – Address/phone number currently unknown.
236. Jermaine Morris – Address/phone number currently unknown.
237. Darnell Martin – Address/phone number currently unknown.
238. Domingas Franklin – Address/phone number currently unknown.
239. Talf Lumpkins – Address/phone number currently unknown.
240. Michelle Caldwell – Address/phone number currently unknown.

- 241. Donetta Watts – Address/phone number currently unknown.
- 242. Richard Hale – Address/phone number currently unknown.
- 243. Lynette Ewing – Address/phone number currently unknown.
- 244. Johnnie Tolliver – Address/phone number currently unknown.
- 245. Robert Lindsey – Address/phone number currently unknown.
- 246. Troy Clark – Address/phone number currently unknown.
- 247. Charlie Miller – Address/phone number currently unknown.
- 248. Aquanda Brooks – Address/phone number currently unknown.
- 249. Vincent Sparks – Address/phone number currently unknown.
- 250. William Moody – Watts’ half-brother – Address/phone number currently unknown.

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Law enforcement named in Chicago Police Department reports and who may have information concerning the investigation that caused Plaintiffs’ wrongful arrests, prosecutions, and convictions, as well as knowledge of the code of silence within the Chicago Police Department, and of the Department’s systematic failure to investigate and discipline officers and employees accused of wrongdoing. Based on records available at this time, these witnesses include but are not limited to:

- 251. Pete Koconis, retired police officer— [REDACTED]; Address currently unknown.
- 252. Robert Stegmiller – Chicago police officer – Address/phone number currently unknown.
- 253. Dorian Smith – Chicago police officer – Address/phone number currently unknown.
- 254. Stephen Watts – Watts’ brother and Chicago police officer – Address/phone number currently unknown.

255. Roderick Watson, Chicago police officer– Address/phone number currently unknown.

256. Edwin Uteras – Chicago police officer – Address/phone number currently unknown.

257. Sean Brandon – Chicago police officer – Address/phone number currently unknown.

258. Officer A. Curetan, Star # 8148 – Chicago police officer – Address/phone number currently unknown.

259. Officer M. Jakob, Star # 8148 – Chicago police officer – Address/phone number currently unknown.

260. Alfie Patterson, Star #9206 – Chicago police officer – Address/phone number currently unknown.

261. Officer Savikas, Star #5991 – Chicago police officer – Address/phone number currently unknown.

262. James Davis – Chicago police officer – Address/phone number currently unknown.

263. Raymond Piwicki – Chicago police officer – Address/phone number currently unknown. See CR 309085.

264. Mitchell Wells – Chicago police officer – Address/phone number currently unknown.

265. Michael Wells – Chicago police officer – Address/phone number currently unknown.

266. Paul Kirner – Chicago police officer – Address/phone number currently unknown. See CR 314992.

267. Ron Rempas – Chicago police officer – Address/phone number currently unknown. See CR 314992.

268. Fred Waller – Chicago police officer – Address/phone number currently unknown.



269. Walter Green – Chicago police officer – Address/phone number currently unknown.
270. Officer Farrel, Star #6 – Chicago police officer – Address/phone number currently unknown.
271. Officer P.D. Dumas, Star #9182 – Chicago police officer – Address/phone number currently unknown.
272. Sgt. James Heneghan – Chicago police officer – Address/phone number currently unknown.
273. Torence Smith – Chicago police officer – Address/phone number currently unknown.
274. Jeffrey Haddon – Chicago police officer – Address/phone number currently unknown.
275. Daria Ringo – Chicago police officer – Address/phone number currently unknown.
276. Sgt. Joseph Gorman – Chicago police officer – Address/phone number currently unknown.
277. Sgt. Tony Di Cristofano – Chicago police officer – Address/phone number currently unknown.
278. Alonzo Harris – Chicago police officer – Address/phone number currently unknown.
279. Sgt. Luz Nieves – Chicago police officer – Address/phone number currently unknown.
280. Joseph Barnes – Chicago police officer – Address/phone number currently unknown.
281. Sgt. Nedra Nelson-Jones – Chicago police officer and wife of Defendant Alvin Jones – Address/phone number currently unknown.
282. Timothy Moragne – Chicago Police officer – Address/phone number currently unknown.
283. Lt. Cobb “Batman” – Chicago police officer – Address/phone number currently unknown.

284. Det. Griffin – Chicago police officer – may have knowledge of the CPD investigation into Plaintiff Anthony McDaniels – Address/phone number currently unknown.

285. Juan Rivera – former head of IAD – may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it relates to Watts and his tactical team – Address/phone number currently unknown.

286. Garry McCarthy – former CPD superintendent – may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it relates to Watts and his tactical team – Address/phone number currently unknown.

287. Eddie Johnson – former current CPD superintendent – may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it relates to Watts and his tactical team – Address/phone number currently unknown.

288. Tina Skahill – Chicago Internal Affairs officer – may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it relates to Watts and his tactical team – Address/phone number currently unknown.

289. Nick Spanos – Chicago police detective – may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it relates to Watts and his tactical team – Address/phone number currently unknown.

290. Nick Roti – former CPD BOC chief – may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it relates to Watts and his tactical team – Address/phone number currently unknown.

291. Rahm Emanuel, Mayor of the City of Chicago, may have knowledge of the Code of Silence that exists within the Chicago Police Department – 121 N. LaSalle Street, Chicago City Hall 4th Floor, Chicago, Illinois 60602.

292. Shannon Spaulding – former CPD officer – may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it relates to Watts and his tactical team, last known counsel: Daniel J. Stohr – 222 N LaSalle St # 200, Chicago, IL 60601; 312-726-1180.

293. Daniel Echeverria, may have knowledge of Defendant Watts's and his Team's unconstitutional and unlawful acts as well as the code of silence within CPD, especially as it

relates to Watts and his tactical team, last known counsel: Daniel J. Stohr – 222 N LaSalle St # 200, Chicago, IL 60601; 312-726-1180.

294. Kenneth Biggs – Chicago Internal Affairs officer – Address/phone number currently unknown.

295. Allen J. Boehmer – Chicago Internal Affairs officer – Address/phone number currently unknown.

296. Keith Calloway – Chicago Internal Affairs officer – Address/phone number currently unknown.

297. Thomas Chester – Chicago Internal Affairs officer – Address/phone number currently unknown.

298. Calvin Holliday – Chicago Internal Affairs officer – Address/phone number currently unknown.

299. Joel Howard – Chicago Internal Affairs officer – Address/phone number currently unknown.

300. Robert Klimas – Chicago Internal Affairs officer – Address/phone number currently unknown.

301. Kenneth Mann – Chicago Internal Affairs officer – Address/phone number currently unknown.

302. Tim Moore – Chicago Internal Affairs officer – Address/phone number currently unknown.

303. Wilbert Neal – Chicago OPS investigator – Address/phone number currently unknown.

304. James Spratte – Chicago Internal Affairs officer – Address/phone number currently unknown.

305. Daniel Dacanay – Chicago Internal Affairs officer – Address/phone number currently unknown.

306. Tiffany Williams – Chicago Internal Affairs officer – Address/phone number currently unknown.

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Other witnesses include members of law enforcement not employed by the Chicago Police Department who may have information concerning investigations into Defendants' unconstitutional and unlawful misconduct, as well as as knowledge of the code of silence within the Chicago Police Department, and of the Department's systematic failure to investigate and discipline officers and employees accused of wrongdoing. Based on records available at this time, these witnesses include but are not limited to:

- 307. Patrick Smith – Former FBI agent – Address/phone number currently unknown.
- 308. Craig Henderson – FBI agent– Address/phone number currently unknown.
- 309. Margaret Schneider – Federal prosecutor– Address/phone number currently unknown.
- 310. Susan Bray – ATF S/A agent– Address/phone number currently unknown.
- 311. William Warren, Jr. – DEA S/A agent – Address/phone number currently unknown.
- 312. Eric A. Ellis – ATF S/A agent– Address/phone number currently unknown.
- 313. Andrew Traver – ATF S/A agent– Address/phone number currently unknown.
- 314. Raymond Hart – FBI S/A agent – Address/phone number currently unknown.
- 315. Sean MacManus – FBI S/A agent – Address/phone number currently unknown.
- 316. Wes Riesmeyer– FBI S/A agent – Address/phone number currently unknown.
- 317. Phil Andrew– FBI S/A agent– Address/phone number currently unknown.
- 318. Brendan J. O'Leary– FBI S/A agent – Address/phone number currently unknown.
- 319. Ginger M. Miller– FBI S/A agent – Address/phone number currently unknown.
- 320. Don M. Anderson III– FBI S/A agent – Address/phone number currently unknown.
- 321. Wesley D. Riesmeyer– FBI S/A agent – Address/phone number currently unknown.

- 322. Philip J. Andrew – FBI S/A agent – Address/phone number currently unknown.
- 323. Lorenzo D. Benedict – FBI S/A agent – Address/phone number currently unknown.
- 324. Stephen J. O'Reilly – FBI S/A agent – Address/phone number currently unknown.
- 325. Julie A. Anderson – FBI S/A agent – Address/phone number currently unknown.
- 326. Jeremy Ashcroft – FBI S/A agent – Address/phone number currently unknown.
- 327. Joan Hyde – FBI S/A agent – Address/phone number currently unknown.
- 328. Timothy J. Keese – FBI S/A agent – Address/phone number currently unknown.
- 329. Dana Depooter – FBI S/A agent – Address/phone number currently unknown.
- 330. Bryan Butler – FBI S/A agent– Address/phone number currently unknown.
- 331. Keith Hennings – FBI S/A agent – Address/phone number currently unknown.
- 332. Jeffrey Moore– FBI S/A agent – Address/phone number currently unknown.
- 333. Eugene Jackson – FBI S/A agent – Address/phone number currently unknown.
- 334. Karen K. Kelly – FBI S/A agent – Address/phone number currently unknown.
- 335. Matthew J. Kern – FBI S/A agent – Address/phone number currently unknown.
- 336. Lora Belle Richardson – FBI S/A agent – Address/phone number currently unknown.
- 337. AUSA Thomas Shakeshaft — Address/phone number currently unknown.
- 338. Patrick Johnson, Assistant United States Attorney, or other witness designated by the United States Department of Justice to address the report and investigation regarding the Investigation of the Chicago Police Department, issued on January 13, 2017, available here: <https://www.justice.gov/opa/file/925846/download> .  
Mr. Johnson's contact information is US Attorneys Office, 219 S. Dearborn St., Suite 500, Chicago, IL 60604; (312) 353-5327.

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Other witnesses may have information as to the following occurrences: Plaintiffs' innocence, the proceedings in Plaintiffs' criminal trials, Plaintiffs' convictions, material produced by CPD pursuant to subpoena or otherwise, and Plaintiffs' prosecution and incarceration. These witnesses may also have information concerning the evidence that was concealed by the Defendants throughout the prosecution; the facts and circumstances of Plaintiffs' arrests; and Defendants' unconstitutional and unlawful acts. Based on records available at this time, these witnesses include but are not limited to:

339. Matthew Mahoney – certain Plaintiffs' criminal trial counsel – 40001 85th Street, Genoa City, WI.

340. Dennis Cooley – certain Plaintiffs' criminal trial counsel– 155 N Michigan Ave # 561, Chicago, IL 6060/ 312-565-1966.

341. Travis Richardson – certain Plaintiffs' criminal trial counsel – 135 S LaSalle St #1930, Chicago, IL 60603/ 312- 256-5846.

342. Terrance MacCarthy – certain Plaintiffs' criminal trial counsel – phone/address unknown at this time.

343. Patrick Boyle – certain Plaintiffs' criminal trial counsel – 155 N Michigan Ave Ste 562, Chicago, IL 60601/312-565-2888.

344. Elizabeth Ribbeck – certain Plaintiffs' criminal trial counsel – phone/address unknown at this time.

345. Patrick White – certain Plaintiffs' criminal trial counsel – phone/address unknown at this time.

346. Frank Himel – certain Plaintiffs' criminal trial counsel – 650 N Dearborn Pkwy # 700, Chicago, IL 60654/ 312-643-0855.

347. Rose Joshua – certain Plaintiffs' criminal trial counsel – 7600 S Merrill Ave, Chicago, IL 60649/ 773-933-7233.

348. Honorable Dave Navarro – former States Attorney Prosecutor – Leighton Criminal Court Building 2650 S. California Ave. Chicago, Illinois 60608/773-674-0513.

349. William Laskaris – States Attorney Prosecutor – phone/address unknown at this time.

350. Kevin Hughes – States Attorney Prosecutor – phone/address unknown at this time.

351. Fabio Valentini – States Attorney Prosecutor – phone/address unknown at this time.

352. Honorable Michael P. Toomin – – Cook County Juvenile Center 1100 S. Hamilton Ave., Rm. 8004 Chicago, Illinois 60612/ (312) 433-4757.

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Individual Plaintiffs also disclose additional individual witnesses that may have knowledge of their arrests, convictions, outcries of innocence, and damages. These witnesses are broken out by Plaintiff for ease of reference. Each witness may also have information relevant to Plaintiffs' *Monell* claims and may be used as Rule 404(b) witnesses. Based on records and information available at this time, these witnesses include but are not limited to:

**Plaintiff Leonard Gipson Additional Rule 26(a)(1)(A)(i) Disclosures**

353. Nicole Parker – Plaintiff's wife – may have knowledge of Plaintiff Leonard Gipson's damages, as well as the circumstances surrounding his arrests. In addition, Ms. Parker may have knowledge of the corrupt activities of Defendant Watts and his tactical team – [REDACTED]-8570

354. Velma Parker – Plaintiff's mother-in-law – may have knowledge of Plaintiff Leonard Gipson's damages, as well as the circumstances surrounding his arrests. [REDACTED]-6452.

355. Theresa Gipson – Plaintiff's mother – may have knowledge of Plaintiff Leonard Gipson's damages, as well as the circumstances surrounding his arrests. [REDACTED]-3133.

356. Demetrius Travis – Plaintiff's father – may have knowledge of Plaintiff Leonard Gipson's damages, as well as the circumstances surrounding his arrests. [REDACTED]-5052.

357. Clifford Roberts – Plaintiff's co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

358. Bobby Coleman – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel.

359. Larry Lomax – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel..

360. George Ollie – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel.

361. Marc Giles – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel.

362. Marcus Gibbs – may have knowledge of the circumstances surrounding Plaintiff’s arrest – may be contacted through counsel.

363. Bill Laskaris – States Attorney prosecutor in Plaintiff’s January 2003 case – may have knowledge of the circumstances surrounding Plaintiff’s false conviction.

364. Dennis Cooley – Plaintiff’s Defense Attorney – may have knowledge of the circumstances surrounding Plaintiff’s arrests and false convictions.

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**Plaintiff Allen Jackson’s Additional Rule 26(a)(1)(A)(i) Disclosures**

365. Shamika Booker – may have knowledge of the circumstances surrounding Plaintiff’s arrest– phone/address unknown at this time.

366. Roy “Shock” Bennett – may have knowledge of the circumstances surrounding Plaintiff’s arrest as well as Defendant Watts and his Team’s misconduct – phone/address unknown at this time.

367. Latanya Woods –Plaintiff’s sister – may have knowledge of Plaintiff’s damages – [REDACTED]-1852.

368. Alexis Woods – Plaintiff’s sister – may have knowledge of Plaintiff’s damages – [REDACTED]-2863.

369. Clarice Woods – Plaintiff’s sister – may have knowledge of Plaintiff’s damages, as well as Defendant Watts’ misconduct – phone/address unknown at this time.

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**Plaintiff Shaun James’s Additional Rule 26(a)(1)(A)(i) Disclosures**



370. Taurus Smith – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest as well as Watts’s Team’s misconduct – may be contacted through counsel.

371. Timothy Conner – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

372. Crystal Looney– Plaintiff’s co-arrestee – may have knowledge of the circumstances surrounding his arrest as well as Watts’s Team’s misconduct – phone/address unknown at this time.

373. Joseph D. Cook – States Attorney prosecutor on Plaintiff’s 2007 case – may have information about Plaintiff’s wrongful conviction – phone/address unknown at this time.

374. Carol J. Milder – Plaintiff’s public defender on Plaintiff’s 2007 case – may have information about Plaintiff’s wrongful conviction – phone/address unknown at this time.

375. Trevor Trotter – Plaintiff’s co-defendant on 2007 case – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

376. Van E. Smith– Plaintiff’s co-defendant on 2007 case – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

377. Jerry Metcalf– Plaintiff’s co-defendant on 2007 case – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

378. Earl Black– Plaintiff’s co-defendant on 2007 case – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

379. Carshea D. Anderson– Plaintiff’s co-defendant on 2007 case – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

380. Regina Mobley– Plaintiff’s co-defendant on 2007 case – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

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**Plaintiff Thomas Jefferson’s Additional Rule 26(a)(1)(A)(i) Disclosures**

381. Lee Rainey – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel.

382. Vercell Wilbourn – may have knowledge of the circumstances surrounding Plaintiff’s arrest – phone/address unknown at this time.

383. Patrice Briggs – Plaintiff’s girlfriend – may have knowledge of Plaintiff’s damages, – [REDACTED]-1452

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**Plaintiff Anthony McDaniels’ Additional Rule 26(a)(1)(A)(i) Disclosures**

384. Antonio Riles – tow truck driver – may have knowledge of the circumstances surrounding Plaintiff’s arrest – phone/address unknown at this time.

385. Lawshawn McDaniels – Plaintiff’s sister – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – phone/address unknown at this time.

386. Annette Ester – Plaintiff’s sister – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – phone/address unknown at this time.

387. Lewis McDaniels – Plaintiff’s Brother – may have knowledge of Plaintiff’s damages – [REDACTED]

388. ASA Park – States Attorney Prosecutor – may have knowledge of the circumstances surrounding Plaintiff’s false conviction.

389. Patrick White – Plaintiff’s public defender – may have knowledge of the circumstances surrounding Plaintiff’s false conviction.

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**Plaintiff Andre McNairy’s Additional Rule 26(a)(1)(A)(i) Disclosures**

390. Mohammed Bandon – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

391. Latice Delphie – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

392. Mario Hollingsworth – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

393. Bert Gaines – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

394. Theresa Smith – States Attorney Prosecutor – may have knowledge of the circumstances surrounding Plaintiff’s false conviction.

395. Elizabeth Ribbeck – Plaintiff’s public defender – may have knowledge of the circumstances surrounding Plaintiff’s false conviction.

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**Plaintiff Lee Rainey’s Additional Rule 26(a)(1)(A)(i) Disclosures**

396. Thomas Jefferson – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel.

397. Vercell Wilbourn – may have knowledge of the circumstances surrounding Plaintiff’s arrest – phone/address unknown at this time.

398. Keena Sanders – Plaintiff’s friend – may have knowledge of Plaintiff’s damages – [REDACTED] 2261.

399. Ruby McGregory – Plaintiff’s mother – may have knowledge of Plaintiff’s damages – [REDACTED] 5118 [REDACTED].

400. Devon Rainey– Plaintiff’s son – may have knowledge of Plaintiff’s damages as well as knowledge of Watts’ Team’s misconduct – [REDACTED] -5118 [REDACTED].

401. Yolanda Toppins – may have knowledge of Watts’ Team’s misconduct – phone/address unknown at this time.

402. Deangelo Campbell – may have knowledge of Watts’ Team’s misconduct – phone/address unknown at this time.

403. Diana Newman– may have knowledge of Watts’ Team’s misconduct – phone/address unknown at this time.

404. Charlie Lockett– may have knowledge of Watts’ Team’s misconduct – phone/address unknown at this time.

405. Gabrielle Rainey – may have knowledge of Watts’ Team’s misconduct – phone/address unknown at this time.

406. Boo Boo Shirley – may have knowledge of Watts’ Team’s misconduct – phone/address unknown at this time.

407. Lloyd Newman– may have knowledge of Watts’ Team’s misconduct – may be contacted through counsel.

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**Plaintiff Jamell Sanders’ Additional Rule 26(a)(1)(A)(i) Disclosures**

408. Yvonne Sanders – Plaintiff’s mother – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest.

409. Marcus Gibbs – Plaintiff’s friend – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – may be contacted through counsel.

410. Christopher Scott – Plaintiff’s friend – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – may be contacted through counsel.

411. Kevin Ochalla – Plaintiff’s public defender – may have knowledge of the circumstances surrounding Plaintiff’s false conviction – phone/address unknown at this time.

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**Plaintiff Frank Saunders’ Additional Rule 26(a)(1)(A)(i) Disclosures**

412. Catrina Bonner – may have knowledge of the circumstances surrounding Plaintiff’s arrest – phone/address unknown at this time.

413. Frances White – Plaintiff’s Grandma – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest.

414. Siohbahn Thompson – may have knowledge of the circumstances surrounding Plaintiff’s arrest – [REDACTED]-7664/ Address unknown at this time.

415. Aleka Stanton – Plaintiff’s wife – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – [REDACTED]-1801; [REDACTED] [REDACTED] [REDACTED].

416. Danielle Williams – Plaintiff’s daughter – may have knowledge of Plaintiff’s damages – [REDACTED] [REDACTED].

417. Derek Stanton – Plaintiff’s uncle-in-law – may have knowledge of Plaintiff’s damages – [REDACTED]-4555; [REDACTED].

418. Navante Johnson – Plaintiff’s wife’s cousin – may have knowledge of Plaintiff’s damages – [REDACTED]-4894; [REDACTED] [REDACTED] [REDACTED].

419. Fazon Stanton – Plaintiff’s step-son – may have knowledge of Plaintiff’s damages – [REDACTED]-3621.

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**Plaintiff Christopher Scott’s Additional Rule 26(a)(1)(A)(i) Disclosures**

420. Ollie Grant – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

421. David Mayberry – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

422. Victor Lyles – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

423. Anthony Woods – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

424. Angelo Maurice Shenault – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through his counsel, Joel Flaxman.

425. Rosalyn Scott – Plaintiff’s mother – may have knowledge of Plaintiff’s damages – phone/address unknown at this time.

426. Crystal Scott – Plaintiff’s sister – may have knowledge of Plaintiff’s damages – phone/address unknown at this time.

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**Plaintiff Taurus Smith’s Additional Rule 26(a)(1)(A)(i) Disclosures**

427. Shaun James – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel.

428. Theresa Smith – Plaintiff’s mother – may have knowledge of Plaintiff’s damages – [REDACTED]-0093; [REDACTED] [REDACTED] [REDACTED].

429. Michael Smith – Plaintiff’s cousin – may have knowledge of Plaintiff’s damages – [REDACTED]-0881.

430. Marsha Rich – Plaintiff’s aunt – may have knowledge of Plaintiff’s damages – [REDACTED]-4067.

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**Plaintiff Henry Thomas’s Additional Rule 26(a)(1)(A)(i) Disclosures**

431. Stanley Beck – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

432. Lester Boyd – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

433. Gregory Robertson – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

434. Eugene Thompson – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – may be contacted through counsel.

435. Patrick Frazier – Plaintiff’s friend – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – [REDACTED]-7536; [REDACTED].

436. LaToya Lewis – Plaintiff’s friend – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – [REDACTED]-7503; [REDACTED].

437. Penny Owens – Plaintiff’s friend – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – phone/address unknown at this time.

438. Andrea Michelle Johnson – Plaintiff’s friend – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his 2006 false arrests – phone/address unknown at this time.

439. Stefon Harrison – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest – may be contacted through Plaintiff’s counsel.

440. Chauncey Ali – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest – phone/address unknown at this time.

441. Tyrone Herron – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest – phone/address unknown at this time.

442. Cameo Potts – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest – phone/address unknown at this time.

443. Antion Payton – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest – phone/address unknown at this time.

444. Corey Owens – Plaintiff’s friend – may have knowledge of the circumstances surrounding his 2006 arrest for trespassing– phone/address unknown at this time.

445. Gregory Owens – Plaintiff’s friend – may have knowledge of the circumstances surrounding his 2006 arrest for trespassing – phone/address unknown at this time.

446. Terrell Williams – Plaintiff’s co-defendant – may have knowledge of the

circumstances surrounding his 2006 arrest for trespassing – phone/address unknown at this time.

447. Mcclinnon Smith – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest for trespassing – phone/address unknown at this time.

448. Jeffrey Brown – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest for trespassing – phone/address unknown at this time.

449. Alfreda Pritchett – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest for trespassing – phone/address unknown at this time.

450. Gerard Butler – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest for trespassing – phone/address unknown at this time.

451. Robert Simmons – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his 2006 arrest for trespassing – phone/address unknown at this time.

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**Plaintiff Phillip Thomas’ Additional Rule 26(a)(1)(A)(i) Disclosures**

452. Sondra Cartwright – Plaintiff’s co-defendant – may have knowledge of the circumstances surrounding his arrest – phone/address unknown at this time.

453. Vanessa Thomas – Plaintiff’s ex-wife – may have knowledge of Plaintiff’s damages, as well as the circumstances surrounding his arrest – phone/address unknown at this time.

454. Brenayder Williams – Plaintiff’s wife – may have knowledge of Plaintiff’s damages – [REDACTED]-9791 - [REDACTED].

455. Tiesha Williams – Plaintiff’s daughter – may have knowledge of Plaintiff’s damages – [REDACTED]-3088 - [REDACTED].

456. Aleon Thomas – Plaintiff’s son – may have knowledge of Plaintiff’s damages – [REDACTED]-7596.

457. Cindy Thomas – Plaintiff’s sister – may have knowledge of Plaintiff’s damages – [REDACTED]-3067 lives in Texas.

458. Suzi Collins – States Attorney Prosecutor – may have knowledge of the circumstances surrounding Plaintiff’s false conviction.

459. Lori Rosen – States Attorney Prosecutor – may have knowledge of the circumstances surrounding Plaintiff’s false conviction.

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**Plaintiff Lionel White Jr.'s Additional Rule 26(a)(1)(A)(i) Disclosures**

460. Kevin Ochalla – Plaintiff's public defender – may have knowledge of the circumstances surrounding Plaintiff's false conviction – phone/address unknown at this time.

Plaintiffs' investigation into this matter continues. Plaintiffs reserve the right to modify and supplement this list as more information becomes available.

**ii.** The following documents, data compilations, and tangible things in the possession, custody, or control of Plaintiff may be used to support Plaintiffs claims or defense:

Plaintiff has already produced a significant amount of documents during the course of litigation in *Baker v. Chicago*, Case No. 16-CV-8940. These documents include, *inter alia*, police reports, criminal trial transcripts, post-conviction petitions, post-conviction transcripts, judicial opinions, pleadings in Plaintiffs' certificate of innocence proceedings, and a variety of other case materials. The documents bear bates numbers BAKER GLENN 000001-036191.

Plaintiffs' investigation into this matter continues and Plaintiffs reserve the right to modify and supplement this list as more information becomes available.

**iii.** Plaintiffs have suffered and continue to suffer incalculable damage, including psychological damage, anguish, and humiliation, which were caused by their wrongful conviction and loss of freedom, the destruction of their reputations, the disruption of their life and intimate relationships, and the suspension of their ability to pursue a career and raise a family. In addition, Plaintiffs Gibbs, McDaniels, P. Thomas, Rainey; Sanders, White Jr., Saunders, and Baker have suffered physical damage as a result of Defendants' wrongdoing, and several Plaintiffs, including Gipson and P. Thomas, incurred substantial costs defending



themselves against the wrongful charges brought against them. Plaintiffs seek compensatory damages from all Defendants and punitive damages from the Individual Defendants. A jury or juries will determine the appropriate amount of these damages. In addition, Plaintiffs seek attorney's fees pursuant to 42 U.S.C. ¶ 1988. At this time, Plaintiffs have not made any computation of their damages.

**iv.** Not applicable.

Respectfully submitted,

/s/ Sean Starr

One of the Attorneys for Plaintiffs Ben Baker, Clarissa Glenn, Marcus Gibbs, Leonard Gipson, Allen Jackson, Shaun James, Thomas Jefferson, Anthony McDaniels, Andre McNairy, Lee Rainey, Jamell Sanders, Frank Saunders, Christopher Scott, Taurus Smith, Henry Thomas, Phillip Thomas, Lionel White, Jr., and Lionel White, Sr.

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