

Exhibit 1

EXHIBIT

C. Glenn No. 6

8/26/21 MTM

exhibitsticker.com

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. 16 cv 8940

**PLAINTIFF CLARISSA GLENN'S ANSWERS TO DEFENDANT
ALVIN JONES'S APRIL 14, 2020 INTERROGATORIES**

Plaintiff Clarissa Glenn answers Defendant Alvin Jones's Interrogatories to

Plaintiff 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 she 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 her injuries in this case. Plaintiff intends to ask the jury to calculate her total losses, and she anticipates that this may be the subject of expert discovery.

Subject to and without waiving Plaintiff's objections to this interrogatory, Plaintiff answers yes—she has and continues to suffer severe emotional damages.

Plaintiff states that Defendants framed her in 2005, which led to her wrongful conviction (from which she has now been exonerated). Her husband and father of her three children, Ben Baker, was also framed on the same date by the same group of Defendants. Mr. Baker had been framed twice previously by many of the same Defendants. And before Plaintiff's conviction, Mr. Baker had already been sentenced to a lengthy prison term on those false charges due to many of the same Defendants' misconduct, fabrication, and perjury.

Because of Defendants' misconduct, Plaintiff was facing the potential of a prison sentence of her own, which forced her to make the excruciating decision to plead guilty to a crime she did not commit in exchange for a sentence of probation so that her three school aged children could have one parent that was not incarcerated and could raise them.

The resulting wrongful conviction led to, among other things, the loss of employment opportunities (and earning potential), the loss of a Chicago Housing Authority voucher, and the loss of a grant for a non-profit Plaintiff attempted to start. These lost opportunities led to untold amounts of emotional damage, depression, and anxiety. Further, as a result of these lost opportunities, Plaintiff's children themselves had to give up their own opportunities to further their education and career goals so that they could work and help provide financially for her family. This caused its own series of emotional trauma to Plaintiff. As any mother could understand, it was emotionally

traumatic knowing that her children had to give up on their own dreams in order to provide financial support to her family as a result of the Defendants' misconduct.

Plaintiff also suffered emotional damage while serving her probationary sentence, which deprived her of liberty and was made all the more traumatic by Plaintiff's knowledge that she was innocent.

Plaintiff has and continues to suffer depression, anxiety, and fear as a result of Defendants' misconduct. Plaintiff has not been treated for all of her emotional injuries.

Plaintiff's investigation into this matter continues and she 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 health care professional and facility rendering you treatment for each injury.

ANSWER: Plaintiff objects to the extent that this interrogatory calls for medical diagnoses and opinions that she 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 her injuries in this case. Plaintiff intends to ask the jury to calculate her total losses, and she anticipates that this may be the subject of expert discovery.

Subject to and without waiving Plaintiff's objections to this interrogatory, Plaintiff answers yes, and incorporates her answer to Defendant Jones's Interrogatory Nos. 1 and 4.

3. Have you fully recovered from the effects of any psychiatric, psychological and/or emotional injury that you sustained as a result of the events alleged in your lawsuit? If your answer is in the negative, describe the nature and extent to which your injury continues or persists.

ANSWER: Plaintiff objects to the extent that this interrogatory calls for medical diagnoses and opinions that she 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, Plaintiff answers no, and incorporates her answer to Defendant Jones's Interrogatory No. 1.

4. Identify by name, address, and telephone number all medical professionals and treatment centers where you reported psychiatric, psychological, and/or emotional injury caused by the actions or conduct of the individual defendants.

ANSWER: Plaintiff 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 these objections, Plaintiff states that she has not seen a medical professional for her mental health injuries, and she has not received medical treatment for those injuries.

5. Identify by name, address, and telephone number any substance abuse programs/treatment centers you enrolled in or attended from five years prior to the arrest(s) in your lawsuit you claim was unlawful up to and including the present date.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is overly broad, and seeks irrelevant information. Subject to these objections, Plaintiff answers that she has never enrolled in a substance abuse treatment center.

6. Did you experience emotional distress, emotional suffering, or negative emotions from your narcotics use *or* other criminal activity you engaged in? If so, please describe the emotional distress, emotional suffering, or negative emotions you

experienced and the duration and time frame of the symptoms and condition.

ANSWER: Plaintiff objects to this Interrogatory on the basis that it is harassing, overly broad, and seeks irrelevant information. Plaintiff objects that this interrogatory is compound and includes multiple questions and subparts that are properly set forth in multiple interrogatories. Plaintiff objects to the extent that this interrogatory calls for medical diagnoses and opinions that she is not qualified to offer or information protected from disclosure by the attorney-client privilege or work product doctrine. Plaintiff 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 also objects to the phrase “other criminal activity” as seeking a legal conclusion and as improperly suggesting that Plaintiff engaged in criminal activity relating to the events at issue in this case, when in fact she was framed by the Defendants.

Subject to these objections, Plaintiff answers no. Plaintiff has no other arrests or convictions.

7. Identify by name, address, and telephone number any psychiatrist, physician, psychologist, therapist or other health care professional and treatment center you reported psychiatric, psychological, and/or emotional injury not caused by the actions or conduct of the individual defendants from five years prior to the arrest(s) in your lawsuit you claim was unlawful up to and including the present date.

ANSWER: Plaintiff 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 these objections, Plaintiff states that she has not seen a medical professional for her mental injuries, and she has not received medical treatment for her mental injuries.

s/ *Josh Tepfer*
One of Plaintiff's
Attorneys

Jon Loevy
Arthur Loevy
Scott Rauscher
Josh Tepfer
Theresa Kleinhaus
Sean Starr
Mariah Garcia
LOEY & LOEY
311 North Aberdeen
Street, 3FL
Chicago, IL 60607
(312) 243-5900
scott@loevy.com

CERTIFICATE OF SERVICE

I, Josh Tepfer, an attorney, hereby certify that on August 11, 2021, I caused a copy of the foregoing PLAINTIFF CLARISSA GLENN'S RESPONSES TO DEFENDANT JONES'S APRIL 14, 2020 INTERROGATORIES to be served on all counsel of record via email.

VERIFICATION

I, Clarissa Glenn, verify under penalty of perjury that I have reviewed the attached Responses to Alvin Jones's April 14, 2020, Interrogatories, and I certify that the answers are true and correct to the best of my knowledge, information, and memory.

Date: Aug 11, 2021

Clarissa Glenn
Clarissa Glenn (Aug 11, 2021 18:46 CDT)

Clarissa Glenn