

# **Group Exhibit B**

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

|                   |   |                          |
|-------------------|---|--------------------------|
| Anthony Murdock,  | ) |                          |
|                   | ) |                          |
| <i>Plaintiff,</i> | ) |                          |
|                   | ) | 20-cv-1440               |
| -vs-              | ) |                          |
|                   | ) | <i>(Judge Feinerman)</i> |
| City of Chicago,  | ) |                          |
|                   | ) |                          |
| <i>Defendant.</i> | ) |                          |

**PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant City of Chicago is requested to respond to the following interrogatories:

1. Identify the name, employer, and title of the person or persons who provided the information used to answer these interrogatories.
2. Describe the investigation undertaken to determine whether the plaintiff Anthony Murdock is a resident of the Northern District of Illinois.
3. Describe the factual basis of the denial in the second sentence of your answer to paragraph 4 of plaintiff's complaint that "this policy served to injure Plaintiff."
4. Identify the allegations of paragraphs 5, 7, and 9 of plaintiff's complaint for which defendant "lacks knowledge sufficient to form a belief as to the truth" thereof.

5. State the basis for your denial of the allegation of paragraph 7 of plaintiff's complaint that plaintiff was "transported to bond court the next morning."

6. State any reasons, other than the written policy described in paragraph 4 of plaintiff's complaint, that explains why plaintiff was not permitted to post cash bond at the police station following his arrest on September 29, 2018.

7. Identify all persons by name and last known address of all persons who have first-hand knowledge of the reasons stated in response to interrogatory 6 and for each such persons describe the facts known to each such person and state whether defendant is in possession of any written document of any sort setting out those facts.

8. Identify by name and last known address all persons involved in creating, preparing, modifying, reviewing, or revising Chicago Police Department Special Order S06-12-02 at any time from July 6, 2015 to the date these interrogatories are answered, and for each 3 months thereafter to the date of trial in this case.

9. For each person identified in response to interrogatory 8, describe the facts known to that person about creating, preparing, modifying, reviewing, or revising Chicago Police Department Special Order S06-12-02 and state

whether defendant is in possession of any written document of any sort setting out those facts.

10. State how, when, and when the City of Chicago, including but not limited to the Chicago Police Department, became aware of General Administrative Order No. 2015-06 of the Circuit Court of Cook County.

11. Has the City of Chicago, including but not limited to the Chicago Police Department, received communications of any sort from the Office of the Chief Judge of the Circuit Court of Cook County pertaining to General Administrative Order No. 2015-06 of the Circuit Court of Cook County and, if so, describe the nature of each such the communication and identify its present custodian with sufficient specificity for a request for production of documents.

12. Has the City of Chicago or any of its departments including but not limited to the Chicago Inspector General, the Chicago Police Department, the Civilian Office of Police Department, the Independent Police Review Authority, received any complaint or complaints by or on behalf of a person taken into custody by police officers of the City of Chicago on a warrant for which the judge had set an amount of cash bail complaining about the inability of the arrestee to post cash bail at a police station.

13. Unless your response to the preceding interrogatory is an unqualified “no,” identify with sufficient specificity for a Rule 34 request for production of documents, each such complaint

Dated: September 24, 2020

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
ARDC No. 08830399  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

|                   |   |                          |
|-------------------|---|--------------------------|
| Anthony Murdock,  | ) |                          |
|                   | ) |                          |
| <i>Plaintiff,</i> | ) |                          |
|                   | ) | 20-cv-1440               |
| -vs-              | ) |                          |
|                   | ) | <i>(Judge Feinerman)</i> |
| City of Chicago,  | ) |                          |
|                   | ) |                          |
| <i>Defendant.</i> | ) |                          |

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant City of Chicago is requested to produce the following documents:

1. All documents relating to the creation, preparation, modification, review, or revision of Chicago Police Department Special Order S06-12-02 from July 6, 2015 to the date these interrogatories are answered, and for each 3 months thereafter to the date of trial in this case.

2. All communications between the Office of the Chief Judge of the Circuit Court of Cook County and the City of Chicago, the Chicago Police Department, employees of the City of Chicago, and consultants or independent contractors retained by the City of Chicago concerning General Administrative Order No. 2015-06 of the Circuit Court of Cook County.

3. All complaints made to the City of Chicago or any of its departments including but not limited to the Chicago Inspector General, the Chicago Police

Department, the Civilian Office of Police Department, the Independent Police Review Authority, by or on behalf of a person taken into custody by police officers of the City of Chicago on a warrant for which the judge had set an amount of cash bail, complaining about the inability of the arrestee to post cash bail at a police station.

Dated: September 24, 2020

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                  |   |                    |
|------------------|---|--------------------|
| Anthony Murdock, | ) |                    |
|                  | ) | Case No. 20 C 1440 |
| Plaintiff,       | ) |                    |
|                  | ) | Judge Feinerman    |
| v.               | ) |                    |
|                  | ) |                    |
| CITY OF CHICAGO, | ) |                    |
|                  | ) |                    |
| Defendant.       | ) |                    |

**DEFENDANT CITY OF CHICAGO’S RESPONSE TO  
PLAINTIFF’S FIRST SET OF REQUESTS TO ADMIT**

Defendant City of Chicago (“the City”), by and through its attorney, Celia Meza, Corporation Counsel for the City of Chicago, for its response to Plaintiff’s first set of requests to admit, states as follows:

1. The City of Chicago does not know why Chicago Police Department Special Order S06-12-02 was amended to include Section IV(B)(3)(a) of the Special Order as it has been in force and effect from February 27, 2018 to the present.

**RESPONSE:** The City objects to this request for admission as vague and ambiguous (“the City of Chicago does not know”). Subject to and without waiving any objection, the City denies this request to admit.

2. The City of Chicago does not know why Chicago Police Department Special Order S06-12-02 was amended to include Section IV(B)(3)(c) of the Special Order as it has been in force and effect from February 27, 2018 to the present.

**RESPONSE:** The City objects to this request for admission as vague and ambiguous (“the City of Chicago does not know”). Subject to and without waiving any objection, the City denies this request to admit.

3. There is no legitimate law enforcement purpose to refusing to permit persons arrested by a Chicago police officer on a warrant issued outside of the First Municipal District of the Circuit Court of Cook County from posting cash bond at the police station where the arrestee is processed.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“legitimate law enforcement purpose,” “refusing to permit”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the City denies this request to admit.



4. There is no legitimate law enforcement purpose to refusing to permit persons arrested by a Chicago police officer on a Saturday, Sunday, or court holiday from posting cash bond at the police station where the arrestee is processed.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“legitimate law enforcement purpose,” “refusing to permit”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the City denies this request to admit.

5. There is no provision of Illinois law that requires Section IV(B)(3)(a) of Chicago Police Department Special Order S06-12-02.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“requires”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the City admits that Illinois law does not specifically “require” that the City adopt Section IV(B)(3)(a) of Special Order S06-12-02, but aver that the section is an attempt to meet the requirement of 725 ILCS 5/109-2, which states in relevant part, “Any person arrested in a county other than the one in which a warrant for his arrest was issued shall be taken without unnecessary delay before the nearest and most accessible judge in the county where the arrest was made.”

6. There is no provision of Illinois law that requires Section IV(B)(3)(c) of Chicago Police Department Special Order S06-12-02.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“requires”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the City admits this request to admit.

7. There is no rule of the Illinois Supreme Court that mandates Section IV(B)(3)(a) of Chicago Police Department Special Order S06-12-02.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“mandates”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the City admits this request to admit.

8. There is no rule of the Illinois Supreme Court that mandates Section IV(B)(3)(c) of Chicago Police Department Special Order S06-12-02.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“mandates”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the City admits this request to admit.

9. There is no order of the Circuit Court of Cook County, if any, that mandates Section IV(B)(3)(a) of Chicago Police Department Special Order S06-12- 02.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“mandates”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the

City admits that no order of the Circuit Court of Cook County mandates that the City adopted Section IV(B)(3)(a) in its specific form, but aver that the section reflects an attempt to comply with General Administrative Order No. 2015-06, which states in relevant part, “Defendants taken into custody by an arrested agency located within Cook County shall be required to appear in bond court in the appropriate district or division of this court.”

10. There is no order of the Circuit Court of Cook County, if any, that mandates Section IV(B)(3)(c) of Chicago Police Department Special Order S06-12- 02.

**RESPONSE:** The City objects to this request to admit as vague and ambiguous (“mandates”) and to the extent it calls for a legal conclusion. Subject to and without waiving any objection, the City admits this request to admit.

Respectfully submitted,

CELIA MEZA  
Corporation Counsel for the City of Chicago

By: /s/Raoul Vertick Mowatt  
Raoul Vertick Mowatt  
Assistant Corporation Counsel

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### **CERTIFICATE OF SERVICE**

I hereby certify that I have served this notice and the attached document **Defendant City of Chicago’s Response to Plaintiff’s First Set of Requests to Admit** by causing it to be delivered by sending copies via e-mail to the following on this 10<sup>th</sup> day of December, 2021.

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/s/Raoul Vertick Mowatt  
Raoul Vertick Mowatt

Assistant Corporation Counsel