

EXHIBIT B

Madeline Mendoza v. Guevara, et al, Case No. 23-cv-2441

SUBPOENA RIDER TO ILLINOIS DEPARTMENT OF CORRECTIONS

Any and all records relating to **JACQUELINE MONTANEZ** (DOB: 05/29/76; IR No: 1006670), including, but not limited to:

housing assignment and transfer documents; admissions, processing or placement records; documentation of gang affiliation; conduct and disciplinary records; adjustment committee summaries; incident reports; behavioral reports; grievances; “CHAMPS” records; any and all “kite logs” related to Jacqueline Montanez; parole records; prisoner review board records; parole agreements; any documents, correspondence, memoranda or notes related to any requests for early release; administrative review board decisions; screening forms; visitor logs; visitation requests; telephone number list request; telephone logs; supplemental program consideration reports; documentation of any requests, denials or completion of any educational programs; documentation of any requests, denials, or assignment to any job or work duties; any and all documentation related to cellmates of Ms. Montanez, and any other documentation maintained in or outside of the master file of **JACQUELINE MONTANEZ**. This request expressly seeks not just the master file currently housed at this individual’s most recent parent institution, but any and all files kept by any prior parent institutions in connection with previously discharged sentences.

PLEASE DO NOT INCLUDE MEDICAL OR MENTAL HEALTH RECORDS. DEFENDANTS WILL SERVE A SEPARATE SUBPOENA FOR MEDICAL AND/OR MENTAL HEALTH RECORDS ONCE AN APPLICABLE HIPAA/MHDDCA ORDER IS ENTERED BY THE COURT IN THIS MATTER.