



UPLC Year-end Report

Davis v. Jeffreys

Summary of Progress in the Case

Since completing expert discovery, UPLC successfully shared expert reports on July 19, 2023. Our experts, Dr. Craig Haney and Mr. Dan Pacholke, disclosed new supplementary expert reports, which included proof of the overuse and worsening conditions of solitary confinement. After these expert reports were submitted, Defendants deposed both experts in August 2023. These depositions went exceptionally well, and we feel we are in a very good position to litigate the merits of the case.

Although the Illinois Department of Correction (IDOC) had the opportunity to disclose rebuttal experts, they requested an extension of time to disclose a witness on the day of the Defendant's expert exposure deadline. The prospective expert had not actually been retained, nor had they begun to work on the case. Suffice to say, their actions fell short of diligence and their request was promptly denied.

In light of IDOC's lack of witnesses, we have been discussing settlement potential; however, we seem to be at a standstill as the State has a policy of not entering into consent decrees. We refuse to enter into any settlement that is not enforceable in federal court.

Significant Decision

Despite having years to retain and disclose expert reports on IDOC's restrictive housing program's constitutionality, IDOC failed to timely disclose anyone and the Court ruled that IDOC had not provided good cause for the delay and thus IDOC is unable to produce an expert report to rebut plaintiff.

Progress Anticipated in the Next Six Months

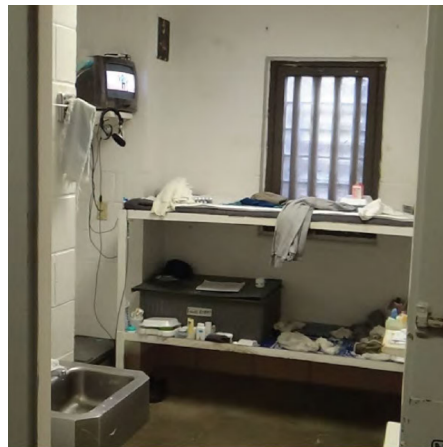
The next step is for IDOC to file a motion for summary judgement by October 31st, 2023. Plaintiff does not believe IDOC has any basis for such a motion. If IDOC does file for summary judgment, briefing will be completed by December 22, 2023.



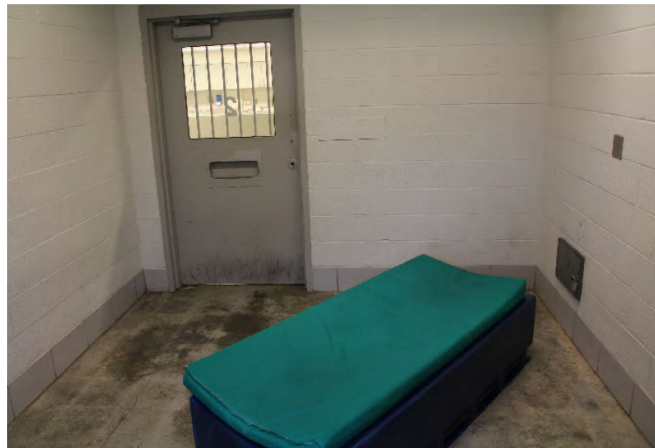
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Photos

Here are images depicting solitary confinement across Illinois:



Menard Correctional Center - Administrative detention cells.



Lawrence Correctional Center - Health Care Unit crisis watch cell.



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Lawrence Correctional Center – Group treatment space for restrictive housing prisoner.

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