

LYNN, LYNN & BLACKMAN, P.C.

March 28, 2014

Dan Barrett, Esq.
ACLU Foundation of Vermont
137 Elm Street
Montpelier, VT 05602

Re: *PLN v. CCA*, Docket No. 332-5-13 Wncv

Dear Dan:

I am writing in response to your public records request to CCA for documents regarding matters filed by Vermont inmates resulting in judgment or settlement. As we have previously discussed, we excluded matters resulting in payment of less than \$500. We also excluded matters that resulted in "payment in kind" settlements (i.e., settling a property claim for a broken TV with a replacement TV).

There have been no judgments against CCA in excess of \$500. We have settled the following cases on the terms indicated:

<i>Baker v. CCA</i> , 31-2-05 Ancv	\$11,000
Complaint, CCA 1 - 3	
Settlement documents and related unprivileged correspondence, CCA 4 - 9	
<i>Cruz v. CCA</i> , 35-2-05 Ancv	\$10,000
Complaint, CCA 10 - 12	
Settlement documents and related unprivileged correspondence, CCA 13 - 17	
<i>LeClaire v. Hofmann</i> , 648-10-05 Wncv	\$650
Complaint, CCA 18 - 22	
Settlement documents and related unprivileged correspondence, CCA 23 - 28	
<i>Louko v. VDOC</i> , 287-7-05 Wmcv	\$850
Settlement documents and related unprivileged correspondence, CCA 29 - 31	
<i>Pratt v. Hofmann</i> , 228-4-05 Wncv	\$3,410
Amended Complaint, CCA 32 - 39	
Settlement documents and related unprivileged correspondence, CCA 40 - 42	

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<i>Glover v. CCA</i> , 460-6-08 Wrcv	\$10,000
Settlement documents and related unprivileged correspondence, CCA 43 - 44	
<i>Stutes v. Tip</i> , 1:07-cv-66	\$4,000
Complaint, CCA 45 - 73	
<i>Karov v. CCA</i> , United States District Court for the Eastern District of Kentucky, 5:08-cv-00407-KKC	\$45,000
<i>Ingerson v. CCA</i> , 12-1-07 Wmcv	\$12,500
Unexecuted documents related to settlement, CCA 74 - 76	
<i>Downey v. CCA</i> ,	\$25,000
Complaint, CCA 77 - 79	
Settlement documents and related unprivileged correspondence, CCA 80 - 84	
<i>Michael Myers</i> , resolved prior to litigation	\$3,000
Statement of Claim, CCA 85 - 90	
Settlement documents and related unprivileged correspondence, CCA 91 - 97	

On *Louko*, I am continuing to work on isolating the Complaint. Mr. Louko was pro se and hand wrote all his pleadings, so the file is a bit of a morass. On *Glover*, the pleadings file was inexplicably missing from our closed file. I will find another way to get my hands on the Complaint. On *Stutes*, the case started in Vermont, but was transferred to Oklahoma, where it was settled. I am working on drumming up the settlement documents.

Karov was handled entirely in Kentucky by CCA's Kentucky counsel. I will provide the complaint and settlement documents from that case as soon as I receive them.

I handled and settled *Ingerson* while working from my home office in Michigan, and I'm afraid I did not duplicate the file for the Burlington office as I typically do. I am enclosing unexecuted versions of the General Release and my correspondence with Plaintiff's counsel, which I just printed from my computer. I believe I have some materials here and will continue to look for them. As Mr. Ingerson was represented by Tom Costello, I can (and will, if need be) reach out to him, as well. The case was a medical negligence claim.

Finally, there are two cases filed under pseudonyms that we resolved in 2005. These are the cases I mentioned that are subject to bilateral confidentiality. I have a request in to plaintiffs' counsel (both were represented by the same lawyer) to waive that confidentiality. I expect to have an answer from him by the time I return from vacation on April 7.

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Thank you for bearing with me. Please do not hesitate to call if you have any questions.

Very Truly Yours,

LYNN, LYNN & BLACKMAN, P.C.


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Enclosures