

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THOMAS REMICK, NADIYAH WALKER,	:	
JAY DIAZ, MICHAEL ALEJANDRO,	:	No. 2:20-cv-01959-BMS
MICHAEL DANTZLER, ROBERT	:	
HINTON, JOSEPH WEISS, JOSEPH	:	
SKINNER, SADDAM ABDULLAH, and	:	
JAMES BETHEA, on behalf of themselves	:	
and all others similarly situated,	:	
	:	
Plaintiffs-Petitioners,	:	
	:	
v.	:	
	:	
CITY OF PHILADELPHIA; and BLANCHE	:	
CARNEY, in her official capacity as	:	
Commissioner of Prisons,	:	
	:	
Defendants-Respondents.	:	

JOINT STATUS REPORT

The Plaintiffs and Defendants City of Philadelphia and Commissioner Blanche Carney (“City”) submit this Status Report in advance of the conference scheduled for August 27, 2020.

I. COMPLIANCE MONITORING

Plaintiffs’ Report

There continue to be serious differences between the Parties with respect to compliance of the Philadelphia Department of Prisons (PDP) with the terms of the Consent Order on Partial Settlement Agreement dated June 3, 2020. As a summary, Plaintiffs continue to receive reports of non-compliance in all areas at a similar rate from all facilities and across housing units, where incarcerated people report not receiving soap, cleaning supplies, sufficient numbers of masks, and out-of-cell time. Especially concerning are reports that with the prolonged lockdowns, people are now experiencing greater tension and exacerbation of mental health problems.

Plaintiffs' counsel also received a report that one of the named Plaintiffs contracted COVID-19 while he was incarcerated at the PDP, was hospitalized, intubated, and requires the use of a wheelchair.

Another development is the transfer of incarcerated women out of the Riverside Correctional Facility (RCF) to the Alternative Special Detention Central Unit (ASD), which includes the transfer to units called MOD3. The conditions at MOD3 raise particular concern, which are discussed below. It appears also that incarcerated men from the Detention Center (DC) have been transferred to RCF. (*See Exhibit A: PDP Daily Headcount and Census*).

The Parties continue to communicate about these issues. Prior to the last conference with the Court on August 13, 2020, at the City's suggestion, Plaintiffs sent a letter on August 5, 2020 that detailed information regarding claims of non-compliance, and on August 11, 2020, PDP responded to the letter. Subsequently, the City responded with further details via email dated August 18, 2020, to which Plaintiffs followed-up by letter on August 19, 2020, which also addressed concerning new developments. The City responded during a discussion between counsel for the parties on August 21, 2020.

A. Concerns Relating To Placement of Women In ASD and MOD 3

Almost all of the incarcerated women who were housed at RCF have been transferred to ASD and MOD 3. ASD consists of several types of housing units or buildings, including MOD 3. Plaintiffs have received troubling reports relating to ASD and MOD 3.

With respect to MOD 3, Plaintiffs have received consistent reports of inhumane, unsafe conditions, including black mold, mildew, chipping paint, dirty mattresses, spider webs, spider eggs, roaches or water bugs, no air conditioning, lack of ventilation, holes in the wall, and exposed wires. These reports are from women currently housed there, but also from incarcerated

men who were previously housed there due to quarantine or medical isolation. Therefore, Plaintiffs have serious concerns regarding MOD 3 and whether it is even appropriate to house any individuals there. The City has informed Plaintiffs that MOD 3 is safe for habitation. Plaintiffs' counsel requested additional details regarding the size, capacity, and current population of ASD and MOD 3. In light of the wide difference between the City's information and the reports received by Plaintiffs' counsel, Plaintiffs have asked to conduct an in-person tour or inspection of MOD 3.

In addition, Plaintiffs received multiple direct reports that after two incarcerated women complained about the conditions and transfers, Deputy Commissioner Clark intentionally left them in MOD 3 while most everyone else was transferred to another part of ASD. Plaintiffs have now received concerning reports that additional women have been transferred to MOD 3 (from ASD), including those identified with serious mental illness, and have a concern about their access to adequate mental health care.

As for ASD, Plaintiffs request information on where the women are being housed. The main concern regarding this housing is the lack of social distancing. Based on reports, these units contain about 8 cubicles, with walls that are about 6-6.5 feet high, with total housing of approximately 40 women on each unit. We have received consistent reports of a complete lack of social distancing in the cubicles and common areas of these units.

Plaintiffs have requested confirmation or clarification about the location and structure of these units. If they are as described, then Plaintiffs are concerned that these conditions mirror the same problems as the dorms in the Detention Center, where COVID-19 would be transmitted rapidly.

Plaintiffs also inquire into the reason for these transfers, and whether this is temporary and short-term, or long-term. The Mayor of Philadelphia issued a press release on Monday, August 24, 2020, which indicated that the changes had been planned for months and prior to COVID-19. Plaintiffs are concerned that this move had been planned for months, yet the reports on the conditions do not appear to reflect adequate preparation or cleaning. Furthermore, if the ASD housing is intended to house incarcerated women for a longer period of time, then Plaintiffs are concerned about potential serious implications for incarcerated women's access to services, including access to medical care and counsel.

Defendants' Report

Executing the PDP's responsibility to effectively utilize the available bed space in its facilities, PDP transferred the female population from the Riverside Correctional Facility on August 22, 2020. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

With regard to the complaints about the ability to engage in social distancing in ASD, Defendants respectfully note that some of these complaints may have arisen out of the change in circumstances resulting from the transfer. The female population, while housed at RCF, was sufficiently low that women were able to be housed one to a cell, though the facility was designed to house two persons per cell. While the facilities at ASD Central are dormitories, the low census, as described above, permits adequate social distancing. In turn, the facilities at ASD MOD 3 are cells, but the individuals incarcerated there now, by and large, share a cell, which is consistent with the design of ASD and the other PDP facilities. The sharing of a cell is permitted by CDC guidance, and still allows for adequate social distancing.

With regard to the purported conditions, ASD Central Unit was used up until April 25, 2020, and ASD MOD 3 most recently housed individuals for a time period ending August 3, 2020. Each of the facilities, ASD Central Unit and ASD MOD 3, was cleaned consistent with CDC guidelines before the women were transferred into those units. PDP is certainly mindful of Plaintiffs' complaints and submits that the conditions are safe for habitation.

The allegations with regard to DC Clark are incorrect. The two women referenced have a different security classification and so had to be separated from the initial population, and the rehousing of people was a function of security classification.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

B. Issues Regarding Masks, Soap and Cleaning Supplies, Out-of-Cell Time, Access to Laundry

In response to the City’s request for more detailed information regarding the nature and quantity of complaints from PDP incarcerated people on compliance with the Consent Order on Partial Settlement Agreement, Plaintiffs provide updated data that reflects reports from incarcerated persons that span multiple housing units across all facilities. The core issues, as

outlined in the Joint Status Reports of June 30, 2020, July 14, 2020, July 28, 2020, and August 13, 2020 continue to include:

- (1) failure to distribute soap
- (2) failure to distribute cleaning supplies,
- (3) failure to distribute the requisite number of masks to incarcerated people,
- (4) staff not wearing face masks,
- (5) failure to provide a minimum of 45 minutes of daily out-of-cell time,
- (6) inadequate access to laundry services.

The reports are detailed below, and further details are provided in the attached Chart, which articulates the extensive reports of non-compliance and the housing units from which those reports originated that Plaintiffs have received. *See Exhibit B.*

1. Failure to Distribute Soap

From June 3, 2020 (the date of the Consent Order) to August 21, 2020, Plaintiffs have received reports from a total of **221** incarcerated people cumulatively about staff failing to distribute soap as required by the Consent Order. In the week of August 15 – 21, 2020, **27** people reported this issue. These reports have come from all four PDP facilities. (*See also Exhibit C*, a chart listing the numbers of individuals from each facility who reported each specific issue). As before, in many instances, the reports are not just that staff fail to distribute free soap, as required, but that soap has not been distributed in weeks or months.

The City has indicated that it will now affirmatively distribute soap on a weekly basis (on Wednesdays).

Defendants' Report

PDP has instituted a weekly soap distribution. Unfortunately, some instances have arisen in which the distributed soap is wasted; in one example inmates in the PICC created hooks on the shower walls with the provided soap. But to investigate and correct the non-distribution issue raised by Plaintiffs, PDP needs to know which individuals are making these reports. PDP has

asked that Plaintiffs provide this information so PDP can address the identified issue. Having extracted from Plaintiffs' chart at least some of the housing units out of which complaints are being made, PDP intends to follow up on those complaints in those housing units. (*See Distilled Chart, Ex. D.*)

PDP also notes that, while it seeks to remedy the issues raised by way of the submitted complaints, of a total population of over 3,800 individuals, Plaintiffs' counsel has confirmed that less than 141 unique individuals reached out to them via letter, call, and hotline in the time period from August 15-21 to make the reports summarized in this section.

2. Failure to Distribute Cleaning Supplies

From June 3, 2020 to August 21, 2020, Plaintiffs have received reports from **225** incarcerated people cumulatively about staff failing to distribute cleaning supplies for the twice weekly cell cleanings, as required by the Consent Order. In the week of August 15 – 21, 2020, **26** people reported this issue. These reports have now come from every PDP facility. (*See Exhibit C*).

The City has stated that automatic distribution of cleaning supplies is not amenable for cleaning supplies. Plaintiffs disagree because making these items only available upon request relies too heavily on correctional officer discretion. Plaintiffs understand that prisons do not believe it safe to leave cleaning supplies out without supervision. However, numerous other prisons have developed a check-out process where cleaning supplies are accounted for, but that incarcerated people have the ability to keep their living spaces sanitary. Plaintiffs request that cleaning supplies similarly be proactively offered to individuals on a weekly or regular basis, in order to ensure that these items are distributed regularly.

Defendants' Report

As agreed by the parties, cell cleaning has two components. First, general inspection cleaning occurs twice a week. Second, incarcerated individuals have the option to request cleaning supplies in order to perform additional cleaning of the cells. Plaintiffs' report appears to identify issues with both of these processes – a lack of provision of general inspection cleaning and a concern that correctional staff would deny access to cleaning supplies upon request by individuals who seek to clean their cells beyond the twice-weekly general inspection cleaning. To the extent the former is an issue, identification of the housing unit on which twice a week general inspection cleaning is reportedly not being done would help to address that problem. [REDACTED]

[REDACTED]

Defendants respectfully submit that this issue could be addressed if they are provided the locations from which complaints arise.

3. Failure to Distribute the Requisite Number of Masks to Incarcerated People

From June 3, 2020 to August 21, 2020, Plaintiffs have received reports from **160** incarcerated people cumulatively that they do not have minimum of four face masks. Last week, from August 15 – 21, 2020, **23** people reported this issue. These reports have come from every PDP facility. (*See Exhibit C*). Many people report never having received more than two or three masks, and others report that when their mask, which are made of thin bedsheets, disintegrate or fall apart, they are refused replacements, even when they ask repeatedly.

The City has stated that it does have masks available, but that automatic distribution of masks is not amenable for masks. Plaintiffs disagree because making masks available only upon request, again relies too heavily on correctional officer discretion. Plaintiffs request that masks

similarly be proactively offered to individuals on a weekly or regular basis, in order to ensure that these items are distributed regularly. However, the counsel for the City has indicated that they would inquire about the number of masks, and whether or not each incarcerated person has 4 masks currently.

Defendants' Report

PDP supplied more than four masks per individual since the onset of Covid, and, since then, has assured that individuals are provided masks upon admission. The mask-distribution practice is that every individual is provided four cloth masks after intake. When a mask becomes unusable for whatever reason it can be replaced. PDP has an inventory of 13,675 masks, and so they are readily available for replacement when sought. With regard to the implication that correctional officers might not facilitate the replacement of a mask upon request, Defendants again request specific identification of location and shift on which this has occurred, as staff has been instructed to replace a mask upon request and this issue should be investigated and corrected. Without this information, Defendants cannot address the identified issue. Mandatory review of masks held by individuals incarcerated is an overburdensome response to a discrete problem.

4. Staff Not Wearing Face Masks

From June 3, 2020 to August 21, 2020, Plaintiffs have received reports from **166** incarcerated people cumulatively about staff failing to wear face masks. In the week of August 15 – 21, 2020, **23** people reported this issue. These reports continue to come from all four PDP facilities. (*See Exhibit C*).

Plaintiffs appreciate the City's efforts in making announcements that staff working in the prisons must wear masks and initiating discipline against some guards for not wearing masks,

but Plaintiffs continue to receive reports that not all staff are wearing masks, and will investigate this further through viewing videos that have been produced.

Defendants' Report

Defendants will take appropriate additional action upon identification of the housing units and shifts on which this is an issue. Discipline has been applied to staff who were found not wearing masks, and facility management reiterates the requirement to and importance of mask-wearing by staff. But the PDP's ability to investigate and correct the alleged failure is hampered by a lack of location data.

5. Failure to Provide the Requisite Daily Out-of-Cell Time

From June 3, 2020 to August 21, 2020, Plaintiffs have received reports from **272** incarcerated people that they do not get a minimum of 45 minutes of daily out-of-cell time. In the week of August 15 – 21, 2020, **28** people reported this issue. These reports continue to come from all PDP facilities. (*See Exhibit C*).

As before, many people continue to report being confined in their cells for 2 or 3 days straight on some occasions, especially over the weekend. Some say they never get out of their cells on the weekends.

As mentioned above, Plaintiffs are particularly concerned that reports indicate that with the continued lockdowns that been ongoing for several months, people are now experiencing greater tension and exacerbation of mental health problems. Plaintiffs have received reports of individuals refusing food trays or undergoing a hunger strike for several days to seek the attention of a supervisor due to the severe conditions. Plaintiffs raised this issue with the City, who stated that they did not believe the number of violent incidents had increased. Plaintiffs, however, note the death of an incarcerated man at the Detention Center last week, who may have

been assaulted by other incarcerated people.¹ Plaintiffs have requested that the City provide the data on violent incidents.

Defendants' Report

Defendants continue to make every effort to ensure that inmates get at least 45 minutes of out of cell time, and a substantial number of housing units meet or exceed this goal. [REDACTED]

[REDACTED]

[REDACTED]

With regard to hunger strikes, management has not been advised that these are attributed specifically to Covid-related restrictions. While a limited number of inmates do use the mechanism of a hunger strike to bring management's attention to an issue, usage of that mechanism predates Covid and, to the best of Defendants' understanding, does not appear related to Covid-associated issues now. With regard to the identified death at DC, Defendants cannot speak to that because there is an open investigation into the death.

6. Inadequate Access to Laundry Service

From June 3, 2020 to August 21, 2020, Plaintiffs have received reports from **209** incarcerated people that they are not being given the opportunity to have their uniforms and linens laundered once a week and/or their masks and underwear laundered twice a week, as required by the Consent Order. In the week of August 15 – 21, 2020, **20** people reported this issue. These reports continue to come from all PDP facilities. (*See Exhibit C*).

¹ See <https://www.univision.com/local/philadelphia-wuvp/mi-hijo-merece-justicia-el-clamor-de-una-madre-hispana-ante-la-muerte-de-su-hijo-en-extranas-circunstancias-video>

Defendants' Report

Defendants, again, respectfully request detailed information on the alleged gaps in provision of laundry service. The information available to management does not show any interruption in laundry service, and the specific information would facilitate resolution of this issue.

7. Concerns about Retaliation

Plaintiffs have also heard intensified reports of retaliation -- that some correctional officers have responded to requests for soap, cleaning supplies, masks, or out-of-cell time with additional threats, such as that they will not let the incarcerated people out of their cells at all. Plaintiffs have even received reports that incarcerated people have been threatened with violence by staff when requesting the items that the Court Order requires. The City has requested more details regarding the reports of threats, and Plaintiffs will be responding to that request.

Defendants' Report

Defendants welcome further information from Plaintiffs on this issue, because PDP certainly does not want staff engaging in this alleged conduct.

C. Access to Counsel

Plaintiff's Report

Plaintiffs' counsel continues to receive reports from attorneys who have missed or delayed legal appointments with their clients, either by phone or videoconference. As Plaintiffs informed the City, most recently, one attorney had three that were missed at PICC. While Plaintiffs are certain that there are many appointments that proceeded as scheduled, missed appointments do continue to be an issue, and suggest that the PDP designate on its website a

point person to whom attorneys could report missed complaints. The City has responded that attorneys should contact the Warden at each facility if an appointment has been missed.

Of greatest concern, CFCF, the facility with the highest population, has the longest wait times for videoconferences (3.5 weeks), phone calls (3 weeks), and in-person visits. Plaintiffs have requested that the City prioritize CFCF for improvements in creating greater access to counsel.

In addition, Plaintiffs are concerned about the ability of counsel to have legal phone or video calls with their clients who are in segregation, quarantine, or medical isolation. Plaintiffs seek clarification, and in the last discussion between the Parties, the City agreed to look into this issue.

Defendants' Report

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] As to individuals in segregation, counsel access is accomplished via in-person visitation in specific spaces dedicated to the segregation population. For those who are in Covid-related isolation or quarantine, PDP minimizes movement of those individuals until they either complete the period of quarantine (14 days) or have a Covid test return negative. During the period of isolation or quarantine, those individuals cannot contact their attorneys because of the interest in minimizing movement of a potentially infected population. PDP makes efforts to advise attorneys when their clients are unavailable on account of entering a Covid-related isolation or quarantine status. The process for access to counsel during intake quarantine is the

same process that applied when the intake quarantine period was five days (before the onset of Covid-19). Those who are separated for other medical reasons have steady access to counsel.

D. Request for Data Regarding COVID-19 Cases

Plaintiff's Report

In Plaintiffs' prior correspondence and report to the Court, Plaintiffs requested that the City provide certain data on a weekly basis. The City has agreed to provide most of the information, except in 2 categories. The City has agreed to provide on a weekly basis:

- a. Number of incarcerated people in the PDP tested for COVID-19 that week and cumulatively
- b. Number of positive and negative results from the COVID-19 tests, that week and cumulatively
- c. The number of people in medical isolation that week
- d. The units that are placed on quarantine
- e. The reasons why the units were placed on quarantine
- f. The length of time the unit has been placed on quarantine
- g. *[The City did not agree to provide letter g - see below].*
- h. Number of persons hospitalized for COVID-19 treatment based on testing or symptoms
- i. Number of persons treated in PDP's health units for COVID-19 symptoms or as a result of testing
- j. *[The City did not agree to provide letter j - see below].*

The City objected to providing the following information:

- g. The list and number of units locked down due to lack of staffing
- j. Reports on staffing levels at each PDP facility

[REDACTED]

[REDACTED]

[REDACTED]

Defendants' Report

Defendants produced the requested information to which they did not object. Those numbers are:

- a. Inmates tested last week, 346, and cumulative, 6,418
- b. Test results last week, 1 positive and 334 negatives, and cumulative, 271 positive and 6,034 negatives
- c. Inmates in isolation last week, pending results 13 (3 at weeks end), and confirmed positive, 0
- d. Housing units in quarantine – units highlighted are no longer in quarantine

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- e. Reasons for quarantine: please see below
- f. Length of time of quarantine: please see above
- g. Not supplied.
- h. Covid patients hospitalized: 0
- i. Covid patients in treatment in PDP health units: 0
- j. Not supplied.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

II. PLAINTIFFS' REQUESTS FOR ADDITIONAL COMPLIANCE MEASURES

Plaintiffs' Report

In Plaintiffs' prior correspondence to the City and to the Court, Plaintiffs requested the additional remedial measures. Below is an update:

1. **Appointment of high level deputy warden to oversee compliance monitoring.**

- a. Plaintiffs requested that the Commissioner appoint a high level deputy warden at each facility to be in charge of monitoring compliance with the Settlement Agreement and be held accountable by the PDP and the Court, if necessary, for non-compliance by the PDP.
- b. The City has agreed to designate the Deputy Warden at each facility to be responsible for overseeing the facility's execution of the terms of the Consent Order. Those individuals will meet on a weekly basis Deputy Commissioner Clark to report on conformity with the terms of the partial settlement agreement.

2. **Commissioner attendance on Court conference calls.**

- a. Plaintiffs requested that the Commissioner be part of the bi-weekly conferences with the Court to further compliance efforts on the issues discussed on these calls.

- b. The City indicated that the Commissioner would attend the upcoming call with the Court.

3. Request for data and information.

- a. Plaintiffs request that on a weekly basis the City provide requested information to Plaintiffs and, also, to the Court.
- b. As discussed above, the City has agreed to provide most information requested, but not information relating to staffing. The City promised to produce the requested information on a weekly basis beginning on August 24, 2020.
- c. Plaintiffs continue to request the information relating to staffing, [REDACTED]
[REDACTED] As stated above, Defendants maintain that this information should not be produced.

4. Electronic filing of Joint Status Reports.

- a. Plaintiffs requested that the Joint Status Report be filed electronically on the docket, in light of the fact that the Philadelphia Department of Prisons is a public and governmental agency, the community has the right to be aware of the ongoing progress on these issues, to ensure the City's compliance with this Court's Order, and provide useful transparency.
- b. The Parties have discussed a process and schedule for the reports where any sought redactions could be negotiated prior to submission of the Report for the Court's consideration and, with the Court's permission, publication. For this Report, the Parties intend on emailing both an unredacted and redacted version to the Court. If there are any unresolved issues regarding redactions, these could be brought to the Court's attention, and the final redacted version would be filed

electronically by the Parties. In the future, this process may take place prior to the Court's Conference Call. Defendants have agreed to this process as a courtesy to Plaintiffs. To the extent the differing perspectives on redaction and publication of these reports to the Court become unduly onerous to negotiate, Defendants reserve the right to withdraw their consent to this submission and publication process.

- c. Defendants maintain that information that implicates security issues in the operation of the facilities, as well as information that could reveal private health information of individuals incarcerated at the PDP, must be redacted. The former category includes references to staffing, facility, location, shifts, and video facility location. The latter information includes information protected by HIPAA, including the identification of housing units by physical or behavioral health status.

Defendants' Report

Defendants have incorporated their report on these issues in the itemized sections above.

Respectfully submitted,

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/s/ Jonathan H. Feinberg
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Attorneys for Petitioners/Plaintiffs

DATE: August 26, 2020

EXHIBIT A

 Get the latest [COVID-19 guidance and updates](#). Check the [status of City services and facilities](#).

Philadelphia Department of Prisons

 / [Philadelphia Department of Prisons](#) / Daily headcount and census

Daily headcount and census

Census for: August 22, 2020

The Philadelphia Department of Prisons (PDP) posts a census of its inmates every day. The census includes a headcount of inmates in each facility. In some cases, a facility is responsible for an inmate who is temporarily outside that facility.

In facility - The total number of inmates currently in custody at a PDP facility. These inmates are physically inside each facility.

Temporarily not in facility - The total number of inmates who are usually in a PDP facility, but are temporarily in another location. This includes four categories: workers, furlough, open ward, and emergency trips.

- Workers are outside the facility itself, but working on campus.
- Furloughs are authorized absences from the facility.
- Open ward inmates have been admitted to a hospital.
- Emergency trips include any inmates who have been taken to the hospital, but not yet admitted.

PDP facility totals - The total number of inmates that each facility is responsible for. This includes both inmates in the facility and inmates who are temporarily not in the facility.

PDP inmates held in other jurisdictions - The total number of inmates that PDP is responsible for, but are in custody outside of the PDP system.

PDP total population - The grand total of inmates that PDP is responsible for. This includes inmates who are in PDP facilities, temporarily out of PDP facilities, and being held in other jurisdictions.

In facility

Facility	Adult males	Adult females	Juvenile males	Juvenile females
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Facility	Adult males	Adult females	Juvenile males	Juvenile females
Riverside Correctional Facility Alternative and Special Detention Central Unit (RCF ASDCU)	-	165	-	-
Curran-Fromhold Correctional Facility (CFCF)	2063	-	-	-
Detention Center (DC)	55	-	-	-
Detention Center Public Health Services Wing (DC PHSW)	28	44	-	-
Philadelphia Industrial Correctional Center (PICC)	1001	-	-	-
Riverside Correctional Facility (RCF)	468	1	21	-
Weekenders	-	-	-	-
In facility headcount total	3615	210	21	-

Temporarily not in facility

Facility	Male workers	Female workers	Male furlough	Female furlough	Male open ward	Female open ward	Male emergency trips	Female emergency trips
Riverside Correctional Facility Alternative and Special Detention Central Unit (RCF ASDCU)	-	-	-	-	-	-	-	-
Curran-Fromhold Correctional Facility (CFCF)	-	-	-	-	2	-	-	-
Detention Center (DC)	-	-	-	-	-	-	-	-

Facility	Male workers	Female workers	Male furlough	Female furlough	Male open ward	Female open ward	Male emergency trips	Female emergency trips
Detention Center Public Health Services Wing (DC PHSW)	-	-	-	-	2	-	-	-
Philadelphia Industrial Correctional Center (PICC)	-	-	-	-	-	-	3	-
Riverside Correctional Facility (RCF)	-	-	-	-	-	-	-	-
Weekenders	-	-	-	-	-	-	-	-
Temporarily not in facility total	-	-	-	-	4	-	3	-

PDP facility totals (both in facility and temporarily not in facility totals)

Facility	Males	Females	Total
Riverside Correctional Facility Alternative and Special Detention Central Unit (RCF ASDCU)	-	165	165
Curran-Fromhold Correctional Facility (CFCF)	2065	-	2065
Detention Center (DC)	55	-	55
Detention Center Public Health Services Wing (DC PHSW)	30	44	74
Philadelphia Industrial Correctional Center (PICC)	1004	-	1004
Riverside Correctional Facility (RCF)	489	1	490
Weekenders	-	-	-

Facility	Males	Females	Total
In facility headcount and temporarily not in facility total	3643	210	3853

PDP inmates held in other jurisdictions

Jurisdiction	Males	Females	Total
State Department of Corrections (DOC)	-	-	-
Juveniles	-	-	-
Delaware County	-	-	-
Lehigh County	3	-	3
All other jurisdictions	95	-	95
Total	98	-	98

PDP total population


<div><div>Philadelphia Department of Prisons</div><div>This content was last updated on May 15, 2020, by Philadelphia Department of Prisons.</div></div>			
	Males	Females	Total
PDP in facility headcount and temporarily not in facility total	3643	210	3853
Total PDP inmates held in other jurisdictions	98	-	98
Total	3741	210	3951

EXHIBIT B

REMICK v. PHILADELPHIA, 2:20-cv-1959-BMS
CHART OF REPORTS RECEIVED BY PLAINTIFFS
Cumulative Reports From June 3, 2020 to August 21, 2020

List of Facilities and Housing Units and Types of Reports Received
 (“Yes” in bold indicates a new report since August 4, 2020)

Facility	Housing Unit	Reports of Staff Not Wearing Masks	Reports of Not Getting 45 min of Out-of-Cell Time	Reports of Not Getting Soap Weekly	Reports of Not Getting Cleaning Supplies for Cells / Living Areas	Reports of Not Having At Least 4 Masks	Reports of Inadequate Access to Laundry
DC	A	yes	yes	yes	yes	yes	yes
DC	D					yes	yes
DC	E	yes		yes	yes	yes	yes
DC	F				yes	yes	yes
DC	G	yes		yes	yes	yes	yes
DC	I	yes		yes	yes	yes	yes
DC	Q	yes				yes	yes
DC	PHSW	yes				yes	yes
CFCF	A1P1	yes	yes			yes	yes
CFCF	A1P2	yes	yes	yes	yes	yes	yes
CFCF	A1P3	yes	yes	yes	yes	yes	yes
CFCF	A1P4	yes	yes	yes	yes	yes	yes
CFCF	A2P1	yes	yes	yes	yes	yes	
CFCF	A2P2	yes	yes	yes	yes		yes
CFCF	A2P3	yes	yes	yes	yes	yes	yes
CFCF	A2P4		yes	yes	yes	yes	yes
CFCF	B1P1	yes	yes	yes	yes	yes	yes
CFCF	B1P2		yes	yes			
CFCF	B1P3	yes	yes	yes	yes	yes	yes
CFCF	B1P4	yes	yes	yes	yes	yes	yes
CFCF	B2P1		yes				
CFCF	B2P3	yes	yes	yes	yes	yes	yes
CFCF	B2P4	yes	yes	yes	yes	yes	yes
CFCF	C1P1	yes	yes	yes	yes	yes	yes
CFCF	C1P2		yes		yes	yes	yes
CFCF	C1P3	yes	yes	yes	yes	yes	yes
CFCF	C2P1	yes	yes		yes	yes	yes
CFCF	C2P4	yes	yes	yes	yes	yes	yes

CFCF	D1P1	yes	yes	yes	yes	yes	yes
CFCF	D1P2	yes	yes	yes	yes	yes	yes
CFCF	D1P3	yes	yes	yes	yes	yes	yes
CFCF	D1P4		yes	yes	yes	yes	yes
CFCF	D2P1	yes	yes	yes	yes	yes	yes
CFCF	D2P2	yes	yes	yes	yes	yes	yes
CFCF	D2P3	yes	yes	yes	yes	yes	yes
CFCF	D2P4	yes	yes	yes	yes	yes	yes
PICC	B	yes	yes	yes	yes	yes	yes
PICC	C	yes	yes	yes	yes	yes	yes
PICC	D	yes	yes	yes	yes	yes	yes
PICC	E	yes	yes		yes	yes	yes
PICC	D1			yes		yes	yes
PICC	F1	yes	yes	yes	yes	yes	yes
PICC	G1	yes	yes	yes	yes	yes	yes
PICC	H1	yes	yes	yes	yes	yes	yes
PICC	J	yes	yes		yes		yes
PICC	F2	yes	yes	yes	yes	yes	yes
PICC	G2	yes	yes	yes	yes		yes
RCF	D	yes	yes	yes	yes	yes	yes
RCF	C			yes		yes	
RCF	E	yes	yes	yes	yes	yes	yes
RCF	F		yes				
RCF	G		yes	yes	yes		yes
MOD 3				yes		yes	yes
ASD	yes			yes		yes	

EXHIBIT C

REMICK v. PHILADELPHIA, 2:20-cv-1959-BMS
CHART OF REPORTS RECEIVED BY PLAINTIFFS

The total number of individuals reporting noncompliance in last week
(August 15 – August 21, 2020)

Facility	Staff not wearing face masks	Failure to provide a minimum of 45 minutes of daily out-of-cell time	Failure to distribute soap on a weekly basis	Failure to distribute cleaning supplies for twice weekly cell cleanings	Failure to distribute the requisite number of masks to incarcerated people	Inadequate access to laundry services
CFCF	4	14	15	12	8	5
ASD	2	0	1	0	4	0
PICC	5	9	5	8	4	8
DC	4	4	5	3	5	5
Mod 3	2	0	1	2	2	2
RCF	0	1	0	1	0	0
Total From August 15-August 21, 2020	17	28	27	26	23	20
Cumulative Total from June 3 – August 21, 2020	166	272	221	225	160	209

EXHIBIT D

		Staff no masks	No 45 minutes	No weekly soap	no cleaning supplies	no 4 masks	inadquate laundry
Since 8/4/2020							
DC	A			x			
DC	D						
DC	E						
DC	F					x	x
DC	G						
DC	I						
DC	Q						
DC	PHSW						
CFCF	A1P1	x	x				
CFCF	A1P2						
CFCF	A1P3						
CFCF	A1P4						
CFCF	A2P1						
CFCF	A2P2		x				
CFCF	A2P3						
CFCF	A2P4		x			x	
CFCF	B1P1						
CFCF	B1P2						
CFCF	B1P3						
CFCF	B1P4						
CFCF	B2P1						
CFCF	B2P3						
CFCF	B2P4						
CFCF	C1P1						
CFCF	C1P2					x	
CFCF	C1P3						
CFCF	C2P1	x					
CFCF	C2P4	x					
CFCF	D1P1						
CFCF	D1P2					x	
CFCF	D1P3						
CFCF	D1P4						
CFCF	D2P1						
CFCF	D2P2						
CFCF	D2P3						
CFCF	D2P4					x	
PICC	B						
PICC	C						
PICC	D						
PICC	E	x				x	
PICC	D1						
PICC	F1						
PICC	G1					x	x
PICC	H1					x	x
PICC	J		x				
PICC	F2						
PICC	G2						
RCF	D						x
RCF	C						
RCF	E						
RCF	F						
RCF	G						
MOD 3				x		x	x
ASD		x		x		x	