

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 September 24, 2020.

A. Compliance Monitoring

Plaintiffs’ Report

As the Court is aware from prior Joint Reports and telephonic court conferences, counsel for Plaintiffs have serious concerns whether Defendants are in compliance with the terms of the Consent Order on Partial Settlement Agreement dated June 3, 2020. Counsel for Plaintiffs continue to receive reports of widespread, systemic non-compliance with the Consent Order. *See* Exhibit A. From September 8-18, 2020, Plaintiffs’ counsel received reports of non-compliance from 11 units at CFCF, 7 units at PICC, 5 units at RCF, 2 units at the Alternative and Special

Detention Central Unit (“ASDCU”), and 1 unit at MOD-3.¹ *See* Exhibit A. The one area where there has been noticeable improvement is the distribution of soap, though Plaintiffs’ Counsel still receive reports of noncompliance.

Insufficient out-of-cell time remains a major concern, with reports coming from 20 different units from September 8-18, 2020. Defendants have acknowledged their failure to comply with this portion of the agreement, blaming staffing shortages. It remains a routine occurrence for correctional staff to keep incarcerated people locked in their cells for one or two full days at a time and sometimes longer. *See e.g.*, Exhibit B, Doyle Decl. ¶ 4,7-9; Hall Decl. ¶ 6; Oum Decl. ¶ 17-18. Moreover, when staff do let incarcerated people out of their cells, it is often for less than the 45 minutes required by the agreement. *See e.g.*, Doyle Decl. ¶ 4,9; Hall Decl. ¶ 5,6,8,. When kept locked inside their cells, incarcerated people do not have the opportunity to shower, call their loved ones, or exercise. *See e.g.*, Doyle Decl. ¶ 4; Vega Decl. ¶3-5. When allowed out for only 15-20 minutes, as is often the case, they have to choose among these essential activities. *See e.g.*, Doyle Decl. ¶ 4; Hall Decl. ¶ 18. Plaintiffs and Defendants will continue to discuss how best to effectively address the lack of out-of-cell time, including

¹ As has been the case since the start of the monitoring period, almost all reports of non-compliance generally impact entire housing units (or, occasionally, tiers or other subsections of housing units), rather than solely individuals. For example, when one person reports that they have been denied cleaning supplies or out-of-cell time, they are almost always reporting that their entire unit (or tier) has been denied these items. Moreover, some individuals may not be able to report non-compliance due to insufficient out-of-cell time or lack of access to stamps or envelopes, and others may choose not to report, especially as more time passes, for fear of retaliation and disillusionment. For these reasons, the number of housing units from which Plaintiffs’ Counsel receive reports is, thus, a much more reliable metric of the scope of Defendants’ compliance than the number of individual reports received. Therefore, Plaintiffs’ Counsel include here the housing units from which reports of non-compliance have been received, rather than the total number of individuals making reports. *See* Exhibit A.

reaching a further settlement agreement that establishes a clear and mandatory requirement for daily out-of-cell time.

Counsel for Defendants recently produced reports regarding projected and actual staffing at the PDP facilities. Review of the recently-produced reports indicate that chronic staffing shortages existed prior to emergence of the COVID-19 pandemic and that the pandemic has greatly exacerbated the staffing issues which are directly impacting the agreements reached by the parties in the Consent Order. According to an initial review of the staffing reports produced by Defendants, CFCF appears to have a greatest issue with staffing shortages, with many months reporting a shortage of over 100 staff. Of the five facilities, the housing units at CFCF report the most pervasive incidents of non-compliance with the Order.² The largest impact of staffing shortages is on out-of-cell time, drastically increasing time in “restricted movement” (where incarcerated people are kept in their cells). Based on initial analysis of the data produced by the City, it appears that restricted movement increased threefold since March 2020. Some restricted movement may be related to COVID-19 measures, but staffing shortages appear to exacerbate these lockdown conditions, relegating incarcerated people to days without movement.

In addition to complaints regarding out-of-cell time, Plaintiffs’ Counsel received reports from 20 different housing units from September 8-18, 2020 that staff were still not distributing cleaning supplies for twice-weekly cell cleanings. *See Exhibit A; E.g., Doyle Decl.* ¶ 23 (“Staff

² Staffing shortages contribute to both non-compliance with the agreement and other problems as well. Sometimes no CO enters a unit for upwards of two hours at a time, leading to delayed response to fights or medical emergencies. *See e.g., Exhibit B, Doyle Decl.* ¶ 11. Plaintiffs’ counsel also received reports of incarcerated men are unable to control their own lights and of lights inside cells remaining on until 2:00 A.M., because there is no staff member on the unit to turn them off. *E.g., id* ¶ 14.

do not give us cleaning supplies to clean our cells.”); Hall Decl. ¶¶ 16–17(same); Oum Decl. 12, ¶¶ 14–16 (“I request cleaning supplies every week and do not receive them.”).

Plaintiffs’ Counsel received reports from 18 different housing from September 8-18, 2020 that incarcerated individuals did not have four facemasks, as required by the Consent Order. *See*, Exhibit A; *E.g.*, Doyle Decl. ¶ 20-21 (describing having only the same two facemasks, made of thin bedsheet material, since May, 2020 and, after a strap broke, he requested another but was told by a CO that there “were no more face masks.”); Hall Decl. ¶ 19(“I have only one face mask [the mask I received upon arrival in June]. I wash it myself in the sink in my cell.”); Vega Decl. ¶ 10 (“I have not been provided with 4 masks. I was given 1 mask.”).

Plaintiffs’ Counsel received reports from 17 different housing units from September 8-18, 2020 that incarcerated people were not able to have their linens and clothing washed in accordance with the Order. *See* Exhibit A; *E.g.*, Doyle Decl. ¶ 32 (reporting that while sheets are washed every week, uniforms are not); Hall Decl. 9, ¶ 21(“Sheet and towel exchanges are inconsistent and unreliable... [linen] exchange did not occur for the past two weeks.”); Oum Decl., ¶ 5 (during the five months spent on Unit F1 at CFCF he never received an exchange of linens, and received clean uniforms only an estimated 5 times). Multiple men noted that while staff failed to wash laundry each week, the bigger problem was the lack of detergent. *See, e.g.*, Doyle Decl. ¶ 28 (reporting an announcement on his unit that only people with their detergent could get their laundry done and thus he was “unable to get my laundry done because I couldn’t afford to buy detergent.”). Reports from PICC indicate that even when staff take their laundry, the items do not return clean due to an absence of detergent.

Plaintiffs' Counsel received reports from 17 different housing units from September 8-18, 2020 that staff were not wearing masks while inside the facility, as mandated by the Order. *See, e.g.*, Doyle Decl. ¶ 22 ("Many staff members either do not wear facemasks at all or pull them down below their mouths"); Vega Decl. ¶ 11("Staff do not consistently wear their masks."); Hall Decl. 8, ¶ 20 ("Staff members wear their masks around their necks most of the time.").

As the Court is aware, counsel for Plaintiffs have identified systemic issues with record-keeping and reporting being done by PDP that was designed to demonstrate compliance with the Partial Settlement Agreement. As discussed during the last telephonic court conference, Defendants have now appointed Deputy Wardens to act as compliance officers at each PDP facility. In order to give these officials an opportunity to address the myriad of issues identified by Plaintiffs' counsel, no new request was made for data last week. Counsel for Plaintiffs did request new data on September 21, 2020, and it is our hope that we will see significant improvements in quality and consistency of the data captured and reported by PDP personnel. Absent significant improvement, Plaintiffs' counsel will continue to raise whether the appointment of an independent monitor is necessary in order to ensure Defendants' compliance with the partial settlement agreement and any future agreements reached by the parties and approved by the Court.

Defendants' Report

The information provided by Plaintiffs, and their selective presentation of information, does not substantiate their contentions. As detailed below, Defendants have continued to achieve substantial compliance with the terms of the Partial Settlement Agreement, detail which generally follows the structure of Plaintiffs' report. Furthermore, review of the available information reveals that, contrary to Plaintiffs' sweeping contentions of widespread

noncompliance, most of the issues are associated with discrete individuals and are capable of location-based remedy. Until the submission of declarations with this iteration of the status report, Plaintiffs have consistently chosen not to provide information that allows Defendants to fix such problems. Demonstrating the efficacy of providing a detailed accounting of an issue, for example, upon receipt of the declarations Defendants were able to address Mr. Doyle's mask issue. He has now been provided four masks, and indicated that he had not asked for a replacement because, although part of the posted notice about the terms of the partial settlement agreement, he did not know that he could. Defendants respectfully request that, at least when speaking with clients who raise this issue, counsel advise their clients that masks are available upon request.

Out of cell time has consistently improved, notwithstanding the selective and dated reporting contained within the affidavits submitted. By way of example, the logs for PICC units D and G2 both reveal that, for the week of September 13-19, all individuals on those units received at least two, and up to three, hours of out of cell time for every day except Sunday, September 13. Individuals incarcerated at RCF and ASDCU/ASD Mod 3 also all received in excess of the 45 minutes of out of cell time on a routine basis. At CFCF, every effort is made to ensure that the minimum amount of time is afforded each incarcerated individual. While operational constraints do mean that there are days on which individuals do not receive that out of cell time, the number of those days has decreased since the reporting period identified by Plaintiffs and, for the reasons that follow, are expected to continue to trend down. Defendants note that out of cell time is provided on a cohorted basis, in keeping with practices to permit adequate social distancing. These measures have proven successful, in that the rate of infection at the facilities remains very low.

Turning to staffing, Defendants note that Plaintiffs appear to have inadvertently misconstrued the contents of the produced documents. The recitation of information appears to reflect differences between staffing levels and the post plan, which are not the same thing. The post plan indicates a maximum staffing level, including staffing for programs that have been suspended during the pandemic. Some of the allocated post numbers are also reflecting of staffing needs when the census is far higher, as it was several years ago, than at the current census levels. Much of the restricted movement identified by Plaintiffs in March 2020 is due to the implementation of the shelter in place status at the outset of the pandemic, a status which continued through early June 2020. Since then, incarcerated individuals have been provided recreational time on a rotational basis, consistent with recommended cohorting principles.

Defendants do acknowledge, however, that staff non-attendance has been an issue. Various efforts are being made to address this, all in service of providing sufficient coverage to increase out of cell time while staying consistent with the requirements of cohorting and social distancing. First, the relocation of the Detention Center population to Riverside Correctional Facility, and the woman from Riverside to the two satellite facilities of ASDCU and ASD MOD 3, has functionally reduced the footprint of the campus from four facilities to three facilities and two satellites. This has resulted in the reassignment of staff previously working at the Detention Center to PICC and CFCF. Those location reassignments will be finalized on September 29. PDP has also made a request to hire another class, a request that is awaiting certification. While this would not cause an immediate expansion in the size of the workforce, if successful it would mean the addition of fifty new employees to the facilities by January 2021 (training would commence in November 2020).

Defendants next address the issues raised with regard to laundry, masks, cleaning supplies, and mask compliance. The facilities have ample detergent. Linens and uniforms are exchanged and washed in industrial sized laundry machines, and detergent is used in cleaning them. Personal items are washed by an inmate employee, who is responsible for washing the personal bags of items that each incarcerated individual can submit for laundering. Some individuals purchase and provide their own detergent from commissary, and for others the available liquid detergent is used. The latter is widely in stock. To the extent an individual is having issues with the manner in which their personal items are being laundered, that problem can be either brought to counsel's attention in this case or submitted via a grievance to management. The inmate employee can be counseled on their job performance or, if they are not doing their job, replaced. Masks remain readily available for replacement. Defendants reiterate their earlier request, that Plaintiffs' counsel advise their clients of this when they speak with them about mask availability complaints. Cleaning supplies also remain available upon request. Finally, as to mask compliance by staff, management continues its practice of addressing noncompliance of staff through discipline when it is observed or discovered. Personnel also counsel inmates on the necessity of wearing masks, and educational signage is posted throughout the housing units. Because of widespread noncompliance among the incarcerated population, Defendants are considering implementing disciplinary actions for sustained mask noncompliance by incarcerated individuals.

Defendants are continuously working to adhere to or exceed the provision of services detailed in the partial settlement agreement. The provision of service issues are all readily addressed by the identification of who has not been provided a particular service. Defendants also affirmatively report that they are making every effort to encourage that staff and

incarcerated individuals get the flu vaccine this year. Health Services has begun to provide vaccinations, with over one hundred administered since September 17. Defendants have been encouraging all individuals in the facilities to get this free vaccine, and have also been educating people on symptoms.

B. Inspection of ASD-CU and MOD-3

Plaintiffs' Report

Plaintiffs' counsel previously conducted an in-person inspection of ASDCU and MOD-3, the facilities currently housing women on September 2, 2020. As previously discussed, ASDCU houses women in three large dormitory units, with women housed in open spaces, sleeping within inches of each other. *See* Exhibit C (photographs of an ASD-CU dorm and cubicle with sleeping bunks).

In such a setting, an outbreak of COVID would spread rapidly among incarcerated women and be extremely hard for PDP to control. Below is the current status of our previously reported concerns.

Plaintiffs reported concerns with the HVAC systems in both ASDCU and MOD-3, as air vents in these facilities appeared rusted and dirty and the windows did not open. Because COVID-19 spreads primarily through airborne respiratory droplets, adequate air ventilation and filtration is important to reducing the possibility of a COVID-19 outbreak. With this in mind, Plaintiffs requested the following information:

- What is the number of times per hour that the HVAC system exchanges air and what percentage of the air exchange comes from outdoor air? For purposes of reducing the likelihood of COVID-19 transmission, experts recommend an air exchange rate of 6

times per hour.³ Defendants have stated that PDP maintenance is running this calculation and they will provide the information when complete.

- What is the minimum efficiency reporting value (MERV) rating, an air filter's ability to remove small particulates from the air, of the air filters in the ASDCU/MOD3 ventilation system? Defendants reported that both ASDCU and MOD-3 use filters with a MERV-8 rating. The U.S. Centers for Disease Control (CDC) has recommended that office buildings and other indoor spaces upgrade their air filters to MERV-13, based on guidance from the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE).⁴ Plaintiffs request that Defendants explore whether PDP can properly insert MERV-13 filters into the PDP's current HVAC units, and, if so, request that they upgrade the filters.
- Has the PDP considered installing portable high efficiency particulate air (HEPA) cleaners? Portable air cleaners, with a HEPA rating, can supplement inadequate HVAC filters. Defense counsel has reported that they will check with the PDP about this possibility.

In the last report to the Court, Plaintiffs reported seeing vents, cell walls and light fixtures that showed signs of deterioration and rust. Defendants report that PDP maintenance staff is

³ <https://www.vox.com/science-and-health/2020/8/19/21364031/coronavirus-air-purifiers-filter-hepa-merv-ventilation> (last visited Sept. 17, 2020).

⁴ In its recommendations, the CDC links to the ASHRAE guidelines. *See* Centers for Disease Control and Prevention, *COVID-19 Employer Information for Office Buildings*, <https://www.cdc.gov/coronavirus/2019-ncov/community/office-buildings.html> (last visited Sept. 17, 2020); and ASHRAE, *Filtration/Disinfection: Mechanical Air Filters*, <https://www.ashrae.org/technical-resources/filtration-disinfection#mechanical> (last visited Sept. 17, 2020).

working to fix these issues. Due to concerns about the sinks and access to the water fountains in MOD-3 cells, Plaintiffs also requested water quality information. Defendants reported that the water fountains do not have individual filters and that PDP has submitted a water sample to the Philadelphia Water Department for testing.

Plaintiffs' Counsel continue to receive reports about conditions at ASDCU and MOD-3. Several of these concerns relate to the increase of the population of women in the PDP. Concerns include the following:

- As of September 21, 2020, the total number of women incarcerated at PDP facilities has risen to 212 people. Units A and C at ASDCU now reportedly house 45 women each, with the individual cubicles in these units sleeping 5 or 6 women, and some have as many as 8.
- Mixing of cohorts in MOD-3. Plaintiffs have received reports that, due to the large number of women in Unit B, women from that unit have been brought to Unit A for out-of-cell time at the same time that women in Unit A were out of their cells.
- Non-confidential medical treatment. Mental health and medical services at MOD-3 are reportedly still being conducted at tables in the common area, where women in their cells can hear what should be confidential communications.
- A lack of exercise and outdoor recreation time. A woman on Unit A at MOD-3 reported only 2 outdoor recreation periods from August 27–September 15, 2020. Women on Unit C at ASD report getting outdoor recreation once or twice a week, but only for 15–30 minutes.
- Women in MOD-3 reported being unable to shower daily, due to the low shower-to-incarcerated person ratio and the lack of out-of-cell time. Defendants report that they

have increased cohort sizes in MOD-3 to increase out-of-cell time which will hopefully alleviate this problem.

Defendants' Report

At the outset, Defendants reiterate that the reason for the transfers that have resulted in the female population being housed at the ASD facilities is to reduce the number of individuals assigned to dormitory housing. As a result of those transfers, the dorm footprint has been substantially reduced, by over four hundred individuals. Furthermore, Defendants continue to take the measures recommended by the Centers for Disease Control to mitigate the introduction and transmission of covid-19 in this setting, the efficacy of which measures is demonstrated in the ongoing low rates of infection. Those measures, in the dormitories of Central Unit, include strongly encouraging the women to sleep head-to-toe, and requiring that masks be worn at all times once an individual has left her bed. In addition to these measures, the census of ASD, both Central Unit and MOD 3, remains below capacity. Specifically in Central Unit (the dormitories), there are about 120 individuals in a facility that has a capacity of 240.

Defendants will supply the requested information regarding filtration to the best of their ability by Friday, September 25. Defendants have not yet heard back from the Water Department, who initially advised that, in essence, no news is good news. Defendants have sought further clarification, and will advise Plaintiffs' counsel once that information is received. Defendants have continued to replace light fixtures and paint vents on a maintenance schedule, and that work continues apace.

C. Access to Counsel

Plaintiffs' Report

Plaintiffs' counsel have received recent reports that the PDP administration has requested the email addresses of all attorneys who are employed by the Defender Association and who are on the Court Appointment list and plan to restrict access to legal calls and videoconferences to these attorneys, with these email addresses, only. Plaintiffs caution against the implementation of this policy as many people in the PDP have attorneys who are not with the Defender Association or on the Court Appointment list, including private, paid criminal defense attorneys and civil attorneys. There is no basis for excluding such attorneys from legal calls and videoconferences with their clients.

Access to counsel for those incarcerated at CFCF remains problematic, with lengthy delays in scheduling legal calls or videoconferences. As of September 18, 2020 the earliest available appointment for a legal call was October 9, 2020 and the earliest available appointment for a videoconference was October 16, 2020. Plaintiffs' counsel received at least one report of a scheduled legal call at CFCF being canceled because there were no correctional officers available to escort the client to social worker in order to have the call.

During the last conference with the Court, the parties discussed the possibility of allowing incarcerated persons to make unrecorded calls to their lawyers from the phones on their housing units, as opposed to specialized cell phones possessed by prison social workers. Defendants reported that implementing a new policy at this point would be unnecessary as increased remote access to counsel at CFCF should be available by the end of September 2020, and by mid-October for the other facilities. Defendants further noted that designating housing unit phones for communication with attorneys could have the adverse impact of limiting

incarcerated people's access to family and loved ones. Plaintiffs have requested details regarding how the Defendants will implement increased access to counsel by the end of this month.

Defendants' Report

The described process of reaching out to counsel for their email addresses does not have the nefarious connotations ascribed to it above. The purpose of this outreach was to have validated email addresses associated with counsel, so that they can be verified ahead of the implementation of the virtual meeting process. Security concerns about non-sanctioned contact with non-lawyers militates in favor of ensuring that those individuals seeking to use this system are, in fact, attorneys. Representatives from the First Judicial District have also provided information to expedite the validation process and thus trim any implementation lag.

As for the one reported missed visit, Defendants simply note that approximately 460 in person and virtual visits occurred last week, and Defendants anticipate this number will increase with the increased availability.

D. Request for Data Regarding COVID-19 Cases

Plaintiffs' Report

Plaintiffs' counsel previously requested that the City provide certain COVID-19 related data on a weekly basis. The City has now agreed to provide all of the data requested. The current information for reference by the Court and counsel is set out in the Defendants' Report below.

Defendants' Report

Defendants produced the requested information to which they did not object. For the week ending September 13, 2020:

- a. Inmates tested last week 225, and cumulative 7,187,

- b. Test results last week, 1 positive and 254 negatives, and cumulative, 276 positive and 6,911 negatives
- c. Inmates in isolation last week, 0 pending results, and 0 confirmed positive,
- d. Housing units in quarantine – units highlighted are no longer in quarantine
 - i. Intake/male – 14 days: CFCF B1Pods 2, 3, and 4, and B2 Pods 1 and 2
 - ii. Intake/female – 14 days: ASD MOD III D Unit; DC 207
 - iii. Non-intake due to possible exposure, plus length of quarantine: None
 - iv. Non-intake due to confirmed infection: None
- 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.

For the week ending September 13, the one identified positive was in intake and was released before the results came back.

Defendants produced the requested information to which they did not object. For the week ending September 20, 2020:

- a. Inmates tested last week 322, and cumulative 7,564,
- b. Test results last week, 3 positives and 319 negatives, and cumulative, 279 positive and 7,285 negatives
- c. Inmates in isolation last week, 1 pending results, and 3 confirmed positive,
- d. Housing units in quarantine – units highlighted are no longer in quarantine

- i. Intake/male – 14 days: CFCF B1 Pods 2, 3, and 4, and B2 Pods 1 and 2
- ii. Intake/female – 14 days: ASD MOD III D Unit; DC 207
- iii. Non-intake due to possible exposure, plus length of quarantine: CFCF D1P3 – 7 days.
- iv. Non-intake due to confirmed infection: None
- 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.

For the week ending September 20, two identified positives were in intake and one was on the cell block.

E. Plaintiffs' Requests for Additional Compliance Measures

Plaintiffs' Report

Plaintiffs' counsel previously requested that Defendants appoint a high level deputy in each PDP 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. Defendants have now done so, and Plaintiffs are hopeful that these individuals can actively address the record-keeping and reporting issues identified in Section A above. Plaintiffs further proposed that the Commissioner participate in the Court's telephonic court conferences. As the Court is aware, Commissioner Carney previously joined a court conference and has agreed to participate in future conferences. Finally, Plaintiffs requested certain staffing data produced in

other historic litigation matters be provided on a weekly basis particularly for housing units that are effectively “locked down” because of staffing shortages. Counsel for Defendants have now produced staffing information that counsel for Plaintiffs is in the process of reviewing.

Defendants’ Report

The assigned deputy wardens continue in their review and oversight responsibilities. They also are able to address identified deficiencies when made aware of them, as evidenced by the rapidity with which the lack of masks complained of by the declarants was remedied. To that end, Defendants reiterate their request that Plaintiffs provide this information on a rolling basis, rather than only in preparation for this reporting to the Court.

Respectfully submitted,

/s/ David Rudovsky
David Rudovsky (PA 15168)
/s/ Jonathan H. Feinberg
Jonathan H. Feinberg (PA 88227)
/s/ Susan M. Lin
Susan Lin (PA 94184)
KAIRYS, RUDOVSKY, MESSING,
FEINBERG, & LIN, LLP
718 Arch Street, Suite 501S
Philadelphia, PA 19106
(215) 925-4400
drudovsky@krlawphila.com
jfeinberg@krlawphila.com
slin@krlawphila.com

/s/ Su Ming Yeh
Su Ming Yeh (PA 95111)
/s/ Matthew A. Feldman
Matthew A. Feldman (PA 326273)
PENNSYLVANIA INSTITUTIONAL
LAW PROJECT
718 Arch St., Suite 304S
Philadelphia, PA 19106
(215)-925-2966

/s/ Craig M. Straw
Craig M. Straw
First Deputy City Solicitor
City of Philadelphia Department of Law
Office: (215) 683-5442
Cell: (215) 776-4528

/s/ Anne B. Taylor
Anne B. Taylor, Esquire
Chief Deputy City Solicitor
Civil Rights Unit, Law Department
City of Philadelphia
1515 Arch Street, 14th Floor
Philadelphia, PA 19102-1595
215-683-5381 (office)
215-683-5397 (fax)
anne.taylor@phila.gov

Attorneys for Respondents-Defendants

smyeh@pailp.org
mfeldman@pailp.org

/s/ Nyssa Taylor

Nyssa Taylor (PA 200885)

/s/ Witold J. Walczak

Witold J. Walczak (PA 62976)

/s/ Hayden Nelson-Major

Hayden Nelson-Major (PA 320024)

AMERICAN CIVIL LIBERTIES UNION OF PENNSYLVANIA

P.O. Box 60173

Philadelphia, PA 19102

(215) 592-1513

ntaylor@aclupa.org

vwalczak@aclupa.org

HNelson-Major@aclupa.org

aszemanski@aclupa.org

/s/ Will W. Sachse

Will W. Sachse (PA 84097)

/s/ Benjamin R. Barnett

Benjamin R. Barnett (PA 90752)

/s/ Mary H. Kim

Mary H. Kim*

/s/ Nicolas A. Novy

Nicolas A. Novy (PA 319499)

/s/ Theeya Musitief

Theeya Musitief (PA 327295)*

DECHERT LLP

Cira Centre

2929 Arch Street

Philadelphia, PA 19104-2808

(215) 994-2496

Will.Sachse@dechert.com

Ben.Barnett@dechert.com

Mary.Kim@dechert.com

Nicolas.Novy@dechert.com

Theeya.Musitief@dechert.com

*indicates counsel who will seek
admission or *pro hac vice* admission

Attorneys for Petitioners/Plaintiffs

DATE: September 24, 2020