

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD, *et al.*,

Defendants.

No. 5:20-cv-00453-MTT

**PLAINTIFF’S DESIGNATIONS
FOR THE MAY 10, 2021 DEPOSITION OF TIA FLETCHER**

Citation Start	End	Subject Matter
15:13	15:18	Tenure at Coastal State Prison (Coastal)
15:20	15:21	Job title at Coastal
19:7	19:10	Knowledge of Plaintiff’s transgender status and gender dysphoria
21:24	22:3	Fletcher Exhibit 1: Mental Health Reception Screen Form – June 4, 2020
23:22	24:7	Knowledge of Plaintiff’s history of suicidality and self-harm
24:18	24:23	Plaintiff’s safety concerns during intake process
25:6	25:20	Plaintiff’s safety concerns at Coastal
26:23	27:1	Plaintiff’s safety concerns via PREA allegations
27:11	27:18	Plaintiff’s reports of PREA incidents and issues with door lock
29:11	29:17	Recollection of SART team meetings
30:25	31:19	Recommendations for higher mental health classification and subsequent responses
32:8	32:25	Treatment team’s recommendation that Plaintiff be classified as Mental Health Level III based on “level of severity”
33:5	34:23	Plaintiff’s transfer to Mental Health Level III facility and subsequent return to Coastal
35:23	36:23	Impact on Plaintiff after being returned to Mental Health Level II
37:16	38:11	Knowledge regarding if those who overruled recommendations for Mental Health Level III classification treated Plaintiff
38:20	38:21	Plaintiff’s expression of suicidal ideation
41:18	42:2	Fletcher Exhibit 3: Suicide Risk Assessment Instrument – November 16, 2020
43:7	43:21	Plaintiff’s disclosure of attempts to self-castrate i.e., “binding”
44:9	44:13	Plaintiff’s placement on long term suicide precautions
45:3	45:6	Factors considered for Plaintiff’s suicide risk assessment

Citation Start	End	Subject Matter
46:1	46:6	Assessment regarding effect of isolation or segregation on Plaintiff
46:13	46:15	Advocacy to GDC officials regarding Plaintiff
46:20	48:4	Discussions with Warden Benton and Deputy Warden of Security about Plaintiff
48:17	49:9	Report to Warden Benton and Deputy Warden of Security about Plaintiff's issue with door lock
50:10	51:14	Fletcher Exhibit 4: Email regarding Plaintiff's reported issues with the door lock
52:7	52:22	Discussions with Warden Benton about Plaintiff getting to pill call
53:12	53:14	Direction that Plaintiff have escort whenever she leaves her cell
54:7	54:12	Issues with Plaintiff's access to mental health medication
55:19	55:24	Knowledge of any evaluation for Plaintiff's women's facility placement and discussion with Warden Benton about Plaintiff's access to female undergarments
56:5	56:13	Plaintiff's request for female undergarments
57:8	57:20	Discussions with Warden Benton about Plaintiff
59:18	59:21	Direction that Plaintiff be escorted by two security members and recorded whenever she leaves her cell
65:13	66:1	Plaintiff's reports about disciplinary reports and retaliation
69:7	69:10	Concerns about segregation exacerbating Plaintiff's symptoms
71:9	71:11	Classification of Plaintiff as PREA victim upon arrival at Coastal State Prison
72:10	72:12	Reclassification of Plaintiff as PREA aggressor while at Coastal State Prison
73:3	73:7	Classification of Plaintiff as a Security Threat Individual
73:16	74:20	Fletcher Exhibit 6: SCRIBE Report – Oct. 8, 2020
73:21	75:18	Fletcher Exhibit 7: SCRIBE Report – Feb. 7, 2021
76:4	76:9	Knowledge regarding change to Plaintiff's PIC eligible date
78:6	78:19	Discussion of John Doe incident with Warden Benton
79:9	80:12	Disciplinary report being changed from allegations of consensual sex to Plaintiff being the alleged aggressor
86:21	86:23	Direction that Plaintiff be videoed when escorted
88:8	88:13	Bases for recommendation that Plaintiff not be sent to segregation
88:14	89:15	Fletcher Exhibit 8: Witness Statement by Tia Fletcher – April 26, 2021
91:14	91:25	Fletcher Exhibit 9: Emails produced by Tia Fletcher regarding Plaintiff
95:7	96:3	Knowledge of reason for denial of Plaintiff's request for female items
96:14	96:21	Discussion with Warden Benton about Plaintiff's access to female items
97:8	97:19	Emails regarding Plaintiff's access to female items
97:23	98:10	Plaintiff's request and Dr. Fass's recommendation regarding access to female items
99:24	102:4	Plaintiff's report of multiple DRs and impact on Plaintiff
105:15	105:20	Discussion with Deputy Warden Betterson regarding attempts by other incarcerated people to watch Plaintiff shower

Citation Start	End	Subject Matter
107:9	107:14	Medical staffing issues and impact on Plaintiff's access to medication
107:21	108:4	Duration of medical staffing issues
108:14	108:21	Opinion on whether able to provide necessary increase in level of care to Plaintiff
114:14	114:16	Impact of escorts on Plaintiff's access to treatment
123:2	123:17	Assessment on effect of segregation on Plaintiff

Respectfully submitted,

Dated: June 4, 2021

/s/ A. Chinyere Ezie

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CERTIFICATE OF SERVICE

I hereby certify that, on June 4, 2021, the foregoing document and all attachments were served on all counsel of record through the Court's CM/ECF system.

/s/ A. Chinyere Ezie
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