

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

ASHLEY DIAMOND,

Plaintiff,

v.

No. 5:20-cv-00453-MTT

TIMOTHY WARD, *et al.*,

Defendants.

**DECLARATION OF A. CHINYERE EZIE**

1. I am a Senior Staff Attorney at the Center for Constitutional Rights and one of Plaintiff Ashley Diamond's attorneys in the above-captioned case.

2. Filed herewith are true and correct copies of the following documents that either were produced to Plaintiff by Defendants, were served by Plaintiff on Defendants, or are certified copies of deposition transcripts provided to Plaintiff by the court reporters:

<b>Exhibit Number</b>	<b>Description</b>	<b>Bates Number(s)</b>	<b>Confidential &amp; Filed Pursuant to Protective Order</b>
1	Email from Alicia Mandin to Benjamin Ford, et al. (May 4, 2020, 4:15PM)	DEF_029665	
2	Transcript of Rule 30(b)(6) Deposition of Sean Ferguson (July 21, 2022)		Yes
3	Email from Chester Hofer to Brooks Benton, et al. (July 7, 2020, 5:34AM) with attachments: SPLC PREA Letters to Timothy Ward, et. al. dated 7/2/20, 5/1/20, 5/20/20, 6/3/20; letter from Inspire Recovery to GA State Board of Pardons & Paroles	DEF004871- DEF004900	
4	Email from Brooks Benton to Robert Toole (July 7, 2020, 10:03AM)	DEF005125- DEF005128	
5	7/10/20 PREA Initial Notification Report	DEF_1062- DEF_1065	

6	Transcript of Brooks Benton Deposition (May 10, 2022)		Yes
7	10/15/20 Earl Thigpen sworn statement	DEF_878- DEF_879	
8	Email from Tamara Cantera to Carl Betterson, forwarded to Brooks Benton (October 15, 2020, 3:06PM) with attachment: PREA Initial Notification 10/10/2020 incident	DEF006385- DEF006388	
9	PREA Initial Notification document re: 10/29/20, 10/30/20, 10/31/20 PREA incidents	DEF_030299- DEF_030300	
10	11/3/20 Ashley Diamond sworn statement	DEF_818- DEF_819	
11	11/5/20 GDC Memo from Carl Betterson to Brooks Benton re: 10/30/20 sexual assault	DEF_806- DEF_807	
12	Plaintiff's Second Expedited Request for Production of Documents to Certain GDC Defendants, served April 30, 2021		
13	Responses and Objections to Plaintiff's Third Requests for Production of Documents to Certain Georgia Department of Corrections Defendants, served July 30, 2021		
14	Transcript of Rule 30(b)(6) Deposition of Grace Atchison (July 27, 2022)		
15	Transcript of Grace Atchison Deposition (September 15, 2022)		Yes
16	Transcript of Michael Anderson Deposition (September 23, 2022)		Yes
17	Transcript of Rule 30(b)(6) Deposition of Brooks Benton (July 19, 2022)		Yes
18	Objections and Responses to "Plaintiff's Fifth Set of Requests for Documents to Defendant Ahmet Holt and Sixth Set of Requests for Documents to Defendant Ward," served September 28, 2022		
19	Transcript of Carl Betterson Deposition (July 15, 2022)		Yes
20	Amendment to Objections and Responses to Plaintiff's Second Set of Interrogatories to Brooks Benton, Ahmed Holt, and Robert Toole, served October 19, 2021		Yes

3. Exhibits Bates-stamped with the prefix "DEF" were served on Plaintiff by counsel for Defendants during discovery.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 17, 2022

/s/ A. Chinyere Ezie

A. Chinyere Ezie (admitted *pro hac vice*)

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 17, 2022, the foregoing document and all attachments were served on all counsel of record through the Court's CM/ECF system.

/s/ A. Chinyere Ezie

A. Chinyere Ezie

*Counsel for Plaintiff Ashley Diamond*