

**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 NOTICE OF FILING AND CERTIFICATION OF NEED FOR FILING
DISCOVERY**

Pursuant to Local Rule 5.1, Plaintiff Ashley Diamond notices the filing of the depositions of Michael Anderson, dated September 23, 2022; Grace Atchison, dated September 15, 2022; Brooks Benton, dated May 10, 2022; and Carl Betterson, dated July 15, 2022, as well as the Rule 30(b)(6) depositions of Grace Atchison, dated July 27, 2022; Brooks Benton, dated July 19, 2022; and Sean Ferguson, dated July 21, 2022. Plaintiff also notices filing of documents produced in discovery as DEF_806–DEF_807, DEF_818–DEF_819, DEF_878–DEF_879, DEF_1062–DEF_1065, DEF004871–DEF004900, DEF005125–DEF005128, DEF006385–DEF006388, DEF_029665, and DEF_030299–DEF_030300. Lastly, Plaintiff notices the filing of Plaintiff’s Second Expedited Request for Production of Documents and Things, dated April 30, 2021; Responses and Objections to Plaintiff’s Third Requests for Production of Documents to Certain Georgia Department of Corrections Defendants, dated July 30, 2021; 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,” dated September 28, 2022; and Amendment to Objections and Responses to Plaintiff’s Second Set of Interrogatories to Brooks Benton, Ahmed Holt, and Robert Toole, dated October 19, 2021.

Counsel certifies that the discovery documents listed above must be filed with the Clerk, so that the Court can properly consider and rule upon Plaintiff's Motion for Spoliation Sanctions Against Defendants Benton, Holt, and Toole, which cites these discovery documents.

Respectfully submitted,

/s/ A. Chinyere Ezie

Dated: October 17, 2022

A. Chinyere Ezie*
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
Phone/Fax: (212) 614-6467
Email: cezie@ccrjustice.org

Elizabeth Littrell, Ga. Bar No. 454949
Southern Poverty Law Center
130 East Ponce de Leon Ave, Ste 340
Decatur, GA 30030
Phone: (404) 221-5876
Fax: (404) 221-5857
Email: beth.littrell@splcenter.org

Rafaela Uribe*
Center for Constitutional Rights
666 Broadway, 7th Floor
New York, NY 10012
Phone/Fax: (212) 614-6483
Email: ruribe@ccrjustice.org

Scott D. McCoy*
Southern Poverty Law Center
2 South Biscayne Boulevard, Suite 3750
Miami, FL 33131
Phone: (334) 224-4309
Email: scott.mccoy@splcenter.org

* Admitted *Pro Hac Vice*

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on October 17, 2022, the foregoing document was 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