IN THE UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF ILLINOIS URBANA DIVISION

PRECIOUS JACKSON,)
Plaintiff,) Case No. 15-cv-2154
VS.) Judge Colin S. Bruce
CITY OF CHAMPAIGN POLICE OFFICER MATT RUSH, et al.)
Defendants.) Jury Trial Demanded)

PLAINTIFF'S SUPPLEMENTAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26

Plaintiff Precious Jackson, by her undersigned attorneys, makes the below supplemental disclosures pursuant to Rule 26(a), of the Federal Rules of Civil Procedure.

WITNESS DISCLOSURES

The following individuals are likely to have discoverable information that plaintiff may use to support her claims or defenses, including but not limited to information relevant under Fed. R. Evid. 404(b) and in support of Plaintiff's *Monell* claim:

 Myron L. Scruggs, 4891 Eagles Ridge Loop, Lathonia, Georgia, 30038, (727) 906-1467, is expected to testify that he sustained an orbital fracture in 2012 after being unreasonably being punched in the face by Matt Rush. Mr. Scruggs is further expected to testify that he put the City of Champaign on notice of Officer Rush's unlawful behavior and tendency to use excessive force when he had a sit down meeting with the mayor of the City of Champaign Don Gerard, and Councilman/Deputy Mayor Tom Bruno, and possibly the Chief of Police of the City of Champaign Police Department together with Professor A. Belden Fields.

2:16-cv-02046-CSB-EIL # 54-3 Page 2 of 3

- 2. Professor Belden Fields, Political Science 361 Lincoln Hall, 605 E. Springfield Ave, M/C 452 Champaign, IL 61820, is expected to testify that he put the City of Champaign on notice of Officer Rush's unlawful behavior and tendency to use excessive force by unreasonably punching people and other means when Professor Fields had a sit down meeting with then Mayor Don Gerard and Councilman/Deputy Mayor Tom Bruno together with Myron Scruggs. Professor Fields is expected to testify that, among the matters discussed was the excessive force used by Officer Rush against Mr. Scruggs and the need for a civilian police review board that could provide meaningful oversight to the Champaign Police Department.
- 3. Barbara Kessel, Courtwatch/Books To Prisoners, 202 S. Broadway Ave, Urbana IL, is expected to testify that she was present at the meeting between Professor Fields, Mayor Gerrard, Councilman Bruno, and Myron Scruggs, and is expected to testify about the substance of the meeting consistent with Professor Belden's anticipated testimony described above.

Investigation continues. Plaintiff reserves the right to identify additional witnesses and documents as his investigation continues and reserves the right to rely upon any witness, document, video or other evidence disclosed by the defendants in this case.

DATED: June 30, 2016

Respectfully submitted,

PRECIOUS JACKSON

BY: /s/ Shneur Nathan Attorney for Plaintiff

Hale Law LLC 53 W. Jackson, Ste. 330 Chicago, IL 60604 snathan@ahalelaw.com

CERTIFICATE OF SERVICE

I, Shneur Nathan, an attorney, certify that on June 30, 2016, I sent via electronic mail, a copy of the attached **Plaintiff's Fed. R. Civ. P. 26 (a) Disclosure** to counsel at the addresses identified on the attached service list.

/s/ Shneur Nathan

Service List

COUNSEL FOR MUNICIPAL DEFENDANTS

David E. Krchak Thomas S. Yu THOMAS, MAMER & HAUGHEY, LLP 30 Main St., Suite 500 P.O. Box 560 Champaign, IL 61824-0560 (217) 351-1500 (217) 351-2169 (fax) krchak@tmh-law.com tyu@tmh-law.com

COUNSEL FOR MATT RUSH

Nathaniel M. Schmitz, Esq. Torricelli & Limentato, P.C. 2504 Galen Drive, Suite 101 Champaign, IL 61821 Tel: (217) 355-5510 Fax: (217) 355-5573 nschmitz@tllawfirm.com