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2 in the women's division as to one, two, three and four.

3 A Well, it is ten bunks to each cell block.

4 Q Each cell block is enclosed?

5 A Yeah.

6
7 MR. CROSS: If the Court please
8 I am going to object to the testimony. The Court viewed
9 the layout and I think the Court already took judicial
10 notice and certainly better than an inmate can testify to
11 as what is confined in other wards.

12 JUDGE BAUM: Do you wish to
13 respond, Mr. Cooper?

14 MR. COOPER: No.

15 JUDGE BAUM: Objection sustained.

16 Q (By Mr. Cooper, continuing): You testified you were moved
17 from 211-1 to 211-4?

18 A Yes.

19 Q Were you given any reason for being moved?

20 A Yes.

21 Q What was that reason?

22 A Well, it was a little discrepancy the dep and I had, so
23 was moved to --

24 Q What happened?

25 A She just said she didn't like my mouth and said I had a
foul mouth and she moved me where she wouldn't have to hear
it.

211-12. That's where I am now.

Q Did you ever become ill over the food at the jail?

A Yes.

Q Is this an occasional occurrence, common occurrence?

A Three times from the food that I was served, like it was delivered to me personally.

Q What is the usual manner for serving meals?

A Like we are in lockup 24 hours.

Q You don't get out of that ward?

A Unless certain depts are on.

Q And your food is brought down to you?

A Yes.

Q Did you observe any foreign matter in your food?

A Spit, or roaches.

Q Did you ever refuse to eat it?

A Yes.

Q Do you often refuse to eat it?

A Whenever Mrs. Anderson delivered my food I refused to eat it or take medication from her.

MR. CROSS: Mrs. who?

THE WITNESS: Anderson.

Q (By Mr. Cooper, continuing): Why did you refuse to take it from Mrs. Anderson?

A Because she's the only one that gives me food with foreign matter in it or roaches.

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Q Did Mrs. Anderson ever refer to you in a derogatory manner?

A As "nigger", yes.

Q She called you a nigger?

A Yes.

Q Have you felt any additional pressures on you because you were going to testify in this lawsuit?

A Only from her, you know, like yesterday -- I think it was yesterday or the day before -- anyway, she was passing medication. She told me I haven't received my sentence, not to count myself too lucky, so I ask her was that a threat, I had already been convicted. I know she's not a judge, she can't give me the time, so like they had these mental patients in there --

Q Mental patients in where?

A In the same cell block we are on.

Q Not the same ward?

A You know, they were moved from 211-1 to 211-3 and 4 and like this -- the one in 4, she throws her stuff on the catwalk. Whatever garbage she has, she throws it on the catwalk, so Mrs. Anderson was picking it up and she was passing medication at the same time.

Q Are you telling me she was passing medication out with one hand and picking up garbage with the other hand?

A This is just an occurrence that happened. She picked up garbage and was passing medication at the same time.