

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

Favian Busby, Michael Edgington, Russell
Leaks, and Joseph Nelson, *on their own behalf
and on behalf of those similarly situated*;

Petitioners-Plaintiffs,

v.

Floyd Bonner, Jr., *in his official capacity*,
Shelby County Sheriff, and the Shelby County
Sheriff's Office,

Respondents-Defendants.

Case No. 20-cv-2359-SHL

PLAINTIFFS' SECOND SET OF INTERROGATORIES TO DEFENDANTS

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Rule 26.1 of the Local Civil Rules of the United States District Court for the Western District of Tennessee, Plaintiffs, by and through their undersigned counsel, request that Defendants Floyd Bonner Jr. in his official capacity as Shelby County Sheriff and the Shelby County Sheriff's Office ("Defendants") provide answers to the following Interrogatories, under oath and in accordance with the Instructions and Definitions set forth below, no later than December 2, 2020. The Definitions and Instructions in Plaintiffs' First Set of Expedited Interrogatories are incorporated herein and made a part hereof and are supplemented as follows.

DEFINITIONS

1. "Air filtration" refers to the process of cleaning the air, including by removing small particles from the air.
2. "Ventilation" means the provision of fresh, outside air into a room or space.

Interrogatory No. 5:

Please provide the number of Detainees who died within seven days of release or transfer out of the Jail between March 12, 2020 and the present, whether they were tested for COVID-19 either within two weeks prior their death or immediately after their death, and if not, state why not.

Response to Interrogatory No. 5:

Interrogatory No. 6:

Please provide the total number of air filters located in the Jail, the MERV rating for each, and for each filter indicate whether the filter cleans air inside the Jail or brings in air from outside the Jail.

Response to Interrogatory No. 6:

Dated: November 2, 2020

Respectfully submitted,

/s/ Andrea Woods

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