

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

TAYLER GRUBB and JOSEPH MARRERO,	)	
on their own behalf and on behalf of	)	
a class of those similarly situated,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 1:26-cv-1460-JPH-TAB
	)	
MONROE COUNTY COUNCIL;	)	
MONROE COUNTY COMMISSIONERS, in	)	
their official capacities;	)	
MONROE COUNTY SHERIFF, in his official	)	
capacity,	)	
	)	
Defendants.	)	

Preliminary Witness and Preliminary Exhibit Lists

Plaintiffs, by their counsel, submit their preliminary witness and exhibit lists as follows:

Preliminary Witness List

1. Tayler Grubb, who may be contacted in care of his counsel.
2. Joseph Marrero, who may be contacted in care of his counsel.
3. As of yet unidentified current or past prisoners of the Monroe County Jail.

Assuming that the class is certified, they may be contacted in care of their counsel.

4. Monroe County Sheriff Ruben Martí, and all future persons holding that office.

They may be contacted in care of their counsel.

5. Monroe County Jail Commander Kyle Gibbons, and all future persons holding that position. They may be contacted in care of their counsel.
6. Monroe County Assistant Jail Commander Matthew Demmings, and all future persons holding that position. They may be contacted in care of their counsel.
7. Monroe County Sheriff Chief Deputy Phil Parker, and all future persons holding that position. They may be contacted in care of their counsel.
8. As of yet unidentified employees of the Monroe County Sheriff. They may be contacted in care of his counsel.
9. Julie Thomas, Lee Jones, and Jody Madeira, Monroe County Commissioners, and all future Monroe County Commissioners. They may be contacted in care of their counsel.
10. Jennifer Crosley, Peter Iverson, Marty Hawk, Trent Deckard, Lix Feitl, David Henry, Monroe County Council members, and all future Monroe County Council members. They may be contacted in care of their counsel.
11. Kenneth Ray, RJS Justice Services, PO 1481, Ashland, KY 41195, 606/694-3031 and/or Dr. Allen R. Beck-Justice Concepts, Inc., 417 E. 87th Pl., Kansas City, MO 64114, 816/361-1711.
12. Unknown persons who authored and/or provided information for the Monroe County Justice Study that is attached as Exhibit 2 to the complaint in this case. The study was authored by the RQAW-DCCM corporation. Plaintiffs' counsel believes the corporation's address is 8770 North St., Suite 110, Fishers, IN 46038..

13. As of yet unidentified expert witnesses.
14. Any and all persons listed on the defendants' initial disclosures and/or any future witness lists.
15. Any and all persons necessary for impeachment or rebuttal, and/or for the authentication of documents.
16. As discovery in this cause is ongoing, the plaintiffs reserves their right to supplement or amend this list. The defendants will be notified of any additional persons in a timely fashion as these persons become known.

Preliminary Exhibit List

1. Daily lists of the population of the Monroe County Jail created by the Marion County Sheriff's Department.
2. All documents attached to any filing in this case.
3. All documents and other materials produced by the defendants or by any third parties in this matter.
4. All depositions taken in this matter and their exhibits.
5. All responses to interrogatories in this matter.
6. All stipulations and responses to requests for admissions in this matter.
7. The complaint and answer to the complaint in this cause and any amended complaints and answers to any amended complaints.
8. All affidavits and verified documents filed in this case.

9. All expert reports and documents referenced therein.
10. All documents noted by the defendants in their disclosures and/or any exhibit lists.
11. Any and all documents necessary for purposes of impeachment or rebuttal.
12. As discovery in this case is ongoing, the plaintiffs reserve the right to supplement or amend this list. The defendants will be notified of any additional documents in a timely fashion as these documents become known.

Kenneth J. Falk
Joshua T. Bleisch
ACLU of Indiana
1031 E. Washington St.
Indianapolis, IN 46202
317/635-4059
fax: 317/635-4105
kfalk@aclu-in.org
jbleisch@aclu-in.org

Attorneys for Plaintiffs and
the Putative Class