

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.) Case No. 1:26-cv-01460-JPH-TAB
)
MONROE COUNTY COUNCIL,)
MONROE COUNTY COMMISSIONERS,)
in their official capacities;)
MONROE COUNTY SHERIFF,)
in his official capacity,)
)
Defendants.)

**DEFENDANT MONROE COUNTY COUNCIL'S
PRELIMINARY WITNESS AND EXHIBIT LISTS**

Defendant Monroe County Council (the “Council”), by counsel and pursuant to the Court’s Case Management Plan [Doc. 32], submits the following Preliminary Witness and Exhibit Lists. The Council reserves the right to amend, supplement, revise, correct, delete, add, or clarify the lists contained herein as the case proceeds or as additional information becomes available through discovery and trial preparation.

Preliminary Witness List

1. Current Council members Peter Iversen, Kate Wiltz, Marty Hawk, Jennifer Crossley, Trent Deckard, Liz Feitl, and David Henry, as well as any future Council members;

2. Current Monroe County Commissioners Lee Jones, Julie Thomas, and Jody Madeira, as well as any future County Commissioners;
3. The Mayor of the City of Bloomington, Kerry Thomson;
4. Current members of the City of Bloomington Common Council, as well as any future City Council members;
5. Current members of the Collaborative Justice Project Working Subcommittee, as well as any future Working Subcommittee members, including but not limited to representatives of the Monroe County Prosecutor's Office and Monroe County Public Defender's Office serving on the Working Subcommittee;
6. Monroe County Sheriff Ruben Martí;
7. Monroe County Sheriff Chief Deputy Phil Parker;
8. Kyle Gibbons, Monroe County Jail Commander;
9. Matthew Demmings, Assistant Monroe County Jail Commander;
10. Other unnamed and unidentified individuals employed by the Sheriff;
11. Other unnamed and unidentified individuals incarcerated or formerly incarcerated at the Monroe County Jail (the "Jail");
12. Plaintiff Tayler Grubb;
13. Plaintiff Joseph Marrero;
14. All persons listed in the parties' respective Initial Disclosures;
15. All persons listed on the parties' respective Witness Lists;
16. All persons described in any discovery taken in this action;

17. All persons necessary to identify, authenticate, or provide foundation for any exhibits in this case;
18. All records custodians necessary for admission into evidence of all business records exchanged during discovery to which any party declines to stipulate;
19. Any and all witnesses discovered between the time this list is filed and the time of trial;
20. All witnesses ultimately deposed in this matter; and
21. Any testifying expert witnesses identified or used by a party in this action.

The foregoing list does not include persons who may be called for purposes of rebuttal or impeachment at trial. The Council reserves the right to add additional witnesses to the foregoing list and reserves any objections it may have to the testimony of any of the above-named witnesses.

Preliminary Exhibit List

1. Agendas, meeting packets, minutes, recordings, and other materials relating to any meeting of the Council at which the Jail was discussed, including but not limited to matters relating to funding the Jail, improvements and renovations to the Jail, the search for and evaluation of potential sites for a new or renovated jail facility, appropriations and budgeting as to the current Jail and any proposed new sites or

construction, and collaborative efforts with other representatives of Monroe County and the City of Bloomington.

2. Agendas, meeting packets, minutes, recordings, and other materials relating to any meeting of the Collaborative Justice Project Working Subcommittee, including but not limited to any recommendations and reports of the Working Subcommittee.
3. Documents and records pertaining to the Council's funding, budgeting, appropriations, and spending allocation to the Jail.
4. Any feasibility studies, reports, analyses, or other documents containing findings relating to conditions at the Jail, site relocation, and viable alternatives.
5. Any and all pleadings filed in this matter;
6. Any and all exhibits listed in the parties' respective Initial Disclosures;
7. Any and all exhibits listed on the parties' respective Exhibit Lists;
8. All documents and things produced responsive to any discovery request served on any of the parties in this matter;
9. All documents and things produced responsive to any discovery request served on any non-parties in this matter;
10. The transcripts of any depositions taken in this matter and all exhibits thereto; and
11. All documents produced by or identified by any other party in the future.

The foregoing list does not include documents and things which may be used for purposes of rebuttal or impeachment at trial. The Council reserves the right to add additional exhibits to the foregoing list and reserves any objections it may have to any attempt to introduce any of the foregoing documents and things as evidence at trial. The Council does not waive, and expressly reserves, all objections as to the relevancy, scope, materiality, privilege, authenticity, and admissibility of any documents and/or other information referred to herein.

Respectfully submitted,

Date: September 21, 2026

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