

EXHIBIT 23

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

KAREN DAVIDSON, DEBBIE FLITMAN,
EUGENE PERRY, SYLVIA WEBBER,
AND AMERICAN CIVIL LIBERTIES
UNION OF RHODE ISLAND, INC.,

Plaintiff

C.A. No. 1:14-CV-00091-L-LDA

v.

CITY OF CRANSTON, RHODE ISLAND,

Defendant

**DEFENDANT'S SUPPLEMENTAL RESPONSE TO PLAINTIFFS'
FIRST SET OF DOCUMENT REQUESTS**

REQUEST NO. 4:

Any and all documents concerning communications between or among persons incarcerated at the ACI and the Mayor, City Council, and/or members of the City Council of Cranston between January 1, 2003 and December 31, 2012.

RESPONSE NO. 4:

Objection. Response No. 4 is overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, after a diligent search, the City has found no responsive documents to this request. The City reserves its right to supplement its response as permitted by the Rules of Civil Procedure.

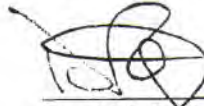
SUPPLEMENTAL RESPONSE NO. 4:

Notwithstanding the City's initial objections, the City attaches its supplemental response to Request No. 4 at bates numbers Cranston-re-00217 through Cranston-re-00220.

CITY OF CRANSTON, RHODE ISLAND

By its Attorneys

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DATED: February 24, 2015

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing DEFENDANT'S SUPPLEMENTAL RESPONSE TO PLAINTIFF'S FIRST SET OF DOCUMENT REQUESTS was emailed on this 24th day of February, 2015.

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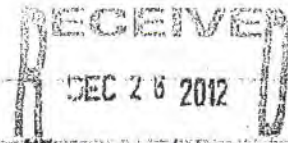
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I'm writing to you about the medical and dental "care" that we aren't getting here at the Women's A.C.T. I've written to all of the Supervisors here and I haven't had any luck.

Let me start off with the dental we have here. We have a dentist come in maybe every 2 weeks but it doesn't mean we're going to be seen. I've had the same root canal that I've had when I came in a year ago. Not to mention all of the other dental issues I have. I was told I can have it pulled but not repaired. The tooth is in the front. They told me I could get a root canal if I could get a dentist on the outside who would see me on a fullough. I also had to pre-pay the dentist, with what?

I've been here since Dec 6, 2011 and I was sentenced to 4 1/2 years. I have missing teeth that they've extracted in the past. I was told I'd get a partial but that's never happened. So I have some difficulty chewing. It's so hard to

get a caring person to help us. I really need help with this dental dilemma.

This is about a "medical care" issue we had. We had a 62 year old woman that just left on medical parole because she was diagnosed with lung cancer. She was constantly complaining about not feeling well and spitting up blood. The medical staff kept dismissing her. Finally after ignoring her cries for help they finally had her checked out and found that she has third stage cancer. I hear that it's spreading so she's not well. They finally gave her immediate release because of how sick she is. She's got 3 young children.

Another woman just died because they wouldn't listen to her when she complained of chest pains and not feeling well. Her roommate came back from lunch and the woman was unresponsive. They had to give her CPR and get her back and lost her again while in the ambulance on the way to the hospital. They brought her to

R.I. hospital. In the end she ended up dying because she had no brain activity due to lack of oxygen to her brain. She was only 44 years old and she had a 9 year old son and her mother just buried her husband that same week. These situations could've been prevented.

We need some help desperately. We need someone to advocate for us. What's it going to take until something is done? We come in here with medical and dental care. We have no self confidence and low self esteem and they want us to walk around here or leave here with no teeth. No wonder people leave prison with the same issues they came in with.

We also leave with medical problems that could've been dealt with here as well. Just because we're in prison doesn't mean we're not people and that we don't need help. It's like they're locking us up and forgetting us.

Can you please help me, help us?

on everything. I'll finish telling you about these situations and on other things. I don't know who else to turn to. I've written to the head of medical and mental numerous times. I've also written to the Assistant Director and the Director of the Prison, to no avail.

I appreciate all of your time and your assistance in this matter. I hope to hear back from you soon. Thank you very much.

Sincerely,
Susan C. Taylor
Susan C. Taylor