

Christopher Goodvine

Goodvine statement:

ON 5 24 16 I was supposed to be on direct obs but staff were not monitoring me and I attempted suicide. The officer who was supposed to be monitoring me, a rookie, later gave me a sworn statement that he failed to watch me and that after I attempted suicide he was ordered to destroy records. Maxine has a copy of lawsuit and signed statement. When DOC/GBCI learned of statement it fired officer. Suit is files and judge has already granted my motion for preliminary injunction: GoodvineV Vandewalle, 16-CV-890-CNC .E.D.WI .Seeking representation. Three other suits settled in April of 2016 and another last year.

of a constitutional right is involved, most courts hold no further showing of irreparable injury. *Mitchell v. Cuomo*, 748 F.2d 804, 806 (7<sup>th</sup> Cir. 1984) (citing 11C Wright and Miller, *Federal Practice and Procedure* § 2984.1 (1973)). The moving party threshold burden is to establish the first and second factor and to "show some likelihood of success on the merits." *Ping v. Nat. Educ. Ass'n*, 870 F.2d 1369, 1371 (7<sup>th</sup> Cir. 1989). The factor of likelihood of success on the merits diminishes in importance but does not vanish entirely once irreparable injury is demonstrated. *Milwaukee Rental v. Budget Rent-A-Car*, 496 F.Supp 253 (E.D.Wis. 1980).

**b. Systemic Conditions Against Which Injunctive Relief is Sought**

The plaintiffs, and other mentally ill prisoners, in CCI's DS-1/DS-2 units must contend not only with the various and often serious mental illnesses, but also with:

- i. The failure to adequately screen and monitor the plaintiffs' and other mentally ill prisoners who enter CCI DS-1/DS-2 segregation units;
- ii. The failure to identify treatment needs and goals of MH-1 and MH-2 prisoners, including the plaintiffs, and develop mental health treatment plans pursuant to those needs;
- iii. The failure to implement inmate-specific security protocols to address the health and safety needs of inmates, including the plaintiffs, with histories of self-harm;
- iv. The failure to adequately treat the various and serious mental illnesses of DS-1/DS-2 segregation inmates, including the plaintiffs, with histories of self-harm;
- v. The failure to hospitalize the plaintiffs and those inmates whose conditions indicate the need for treatment in a traditional clinical setting;
- vi. The failure to properly train staff assigned to monitor the plaintiffs' and other suicidal inmates and to alert those guards of the particular health and safety issues, including propensities, habitualities and psycho-characterological indexes of said inmates;
- vii. The failure to discipline and/or discharge correctional officers and staff whose derelictions, inattention, remissness and habitual and documented lackadaisical responses to known substantial risks of harm;
- viii. The failure to promulgate protocols for acute intervention such as therapeutic restraints, padded full-body suits or padded or rubber cells;
- ix. The punishing of mentally-ill inmates, including the plaintiffs, for compulsive self-harm behaviors.
- x. The isolation of and imposed sensory deprivation upon the plaintiffs and other mentally-ill inmates for their compulsive acts of self-harm, which urgently exacerbates their conditions;
- xi. The improper administration of medication by correctional officers; and,
- xii. The failure to provide means to request help for psychological or medical emergencies to the plaintiffs and other DS-1/DS-2 inmates.

(Am. Compl., Dkt. 15, at ¶¶ \_\_\_\_ - \_\_\_\_; PSSOF at ¶¶ \_\_\_\_ - \_\_\_\_).