

Status of Production as of 3/28/25
Law v. BOP, 4:24-cv-06628-YGR

Record Requested	Production	BOP Designated as Priority	Pages Estimated or Produced
1. All communications and documents between or among employees, including executive staff, supervisors, and staff and records containing or regarding guidance on decision to release or transfer people and indicating how the DOJ or BOP determined, quantified, or measured decision to transfer or release based on these criteria.	None	Yes	Christenson Decl. estimated 80,000 pages including duplicates.
2. Creation of and changes to the criteria used to determine which people were or will be cleared for transfer or release. How DOJ or BOP determined, quantified, or measured transfer or release eligibility based on these criteria.	None	Yes	
3. Guidance provided to Warden and United States Attorneys in granting or opposing compassionate release and other motions for reduced sentences.	None		
4. Compassionate release: Individual records and lists related to who Warden, BOP, and Courts considered for compassionate release, i.e. "Warden letter" requests and records indicating status of cases.	None	Yes	
5. Case reviews: Lists of who was reviewed before transfers, on what days and times, outcomes of case reviews. Including JUSTICE/BOP-005, Inmate Central Records System records.	None	Yes	
6. Medical Reviews: Lists of who was reviewed before transfers, on what days and times, outcomes of medical reviews. Records in JUSTICE/BOP-007, Inmate Physical and Mental Health Record System.	None		
7. All communications and documents regarding all Grievances related to compassionate release, including JUSTICE/BOP-004, Inmate Administrative Remedy Record System.	In part 1/24/25	Yes	11 Pages (1-11/51)

Status of Production as of 3/28/25
Law v. BOP, 4:24-cv-06628-YGR

8. All communications and documents with immigration authorities, employees, including executive staff, supervisors, and staff.	None		
9. Documents indicating asylum, or U-visa, or TVPA eligibility or claim, JUSTICE/BOP-005, Inmate Central Records System records - Central File records.	In part 1/24/25 - In full 3/21/25		1/24/25 - 5 Pages (46-51/51) - 3/21/25 6 pages.
10. All communications and documents regarding all Grievances related to immigration, including JUSTICE/BOP-004, Inmate Administrative Remedy Record System.	In part 1/24/25	Yes	8 Pages (25- 33/51)
11. Tort Claims Forms related to deprivation of property.	In Part 3/21/25	Yes	637 pages.
12. Forms and administrative appeals related to BOP deprivation of property, and in JUSTICE/BOP-006, Inmate Trust Fund Accounts and Commissary Record System.	In part 1/24/25	Yes	10 Pages (34-44/51)
13. Records contained in JUSTICE/DOJ-008, Department of Justice Grievance Records, JUSTICE/BOP-004, Inmate Administrative Remedy Record System all grievances related to transfer and closure. E.g. BP8/COP OUT, BP9, BP10, BP-11, BP148 Inmate to Staff Request, "BP229 Admin Remedy Request", "BP230 Regional Remedy Appeals", "BP231 CO Admin Remedy Appeal" and the log of administrative remedy filings.	In part 1/24/25	Yes	12 Pages (12-24/51)
14. All tort claims forms related to transfer and closure and status and outcome of cases. Records in JUSTICE/BOP-009, Administrative Claims Record System e.g. "Tort Claim Response."	None	Yes	
15. "BP362 Injury Assessment and Follow up."	None	Yes	
16. Daily staff roster for dates of prison closure and transfers.	None		
17. Records indicating how many staff and of what job description were moved to Dublin when, and what location they came from.	None		
18. Records indicating when people were transported and where they were transported.	None		

Status of Production as of 3/28/25
Law v. BOP, 4:24-cv-06628-YGR

19. Use of force.	None		
20. Communications and records noting who was and is working where and when. E.g. records noting which staff came out of voluntary or involuntary leave or retirement to staff the closure and transfers and other facilities. E.g. Contracts for staffing the closure and transfer, including records that note where people under investigation or leave or retired staffed the transfer and other facilities. E.g. Records indicating which staff who were or are under investigation worked where when.	None		
21. Investigation and discipline issued.	None		
22. Records describing or including any guidance or training provided to BOP concerning the closure and transfer.	None		
23. All records explaining or discussing the Bureau's rationale for closure and transfer. E.g. records in JUSTICE/DOJ-003, Correspondence Management Systems (CMS).	None		
24. All presentations, publications, training materials, pamphlets, press releases, or other documents explaining or providing guidance on closure and transfer.	None		
25. BP A0577 Department of Justice Document Removal Certification.	None		
26. Expenditures related to closure and transfer as logged in JUSTICE/DOJ-001, Accounting Systems for the Department of Justice.	None		
27. Number of flight tickets booked, when flights booked, cost of flights, whether on government or private transport.	None		
28. Number of buses booked, when booked, cost, whether on government or private transport.	None		
29. Number of private cars, taxis, Ubers, Lyftsm etc. booked, when booked, cost.	None		
30. Records that pertain to any budget and reimbursement agreements related to closure and transfer including policies, procedures, memoranda, or guidance.	None		
31. "BP A0125 Daily Expenses."	None		
32. "BOP 109 Stock Record."	None		

Status of Production as of 3/28/25
Law v. BOP, 4:24-cv-06628-YGR

33. "Outside Contractor's Inventories."	None		
34. "BP-A0826 DOJ Application for Transit Subsidy."	None		
35. Communications sent to and received from federal and California elected officials regarding closure and transfer.	None	Yes	
36. Special master report about conditions at Dublin, transfer, closure, conditions at new facilities.	None	Yes	
37. Audits: (a) Dublin Task Force Report, (b) Moss Group Report, (c) PREA Related Audits and Reports	None	Yes	
38. "BP-A0367 Employee Performance Appraisal."	None		
39. "Program Reviews/Audit Responses."	None		
40. "Agents Inspections."	None		
41. Lists of jobs and corresponding pay rate people were working before transfer, and after transfer.	None		
42. Conditions related to release at facilities people were transferred to. a. Programs Available at facilities people were transferred to. b. Work available at facilities people were transferred to. c. Restitution rates at facilities people were transferred to.	None		
43. Which former Dublin staff are working at new facilities.	None		
44. Records retention schedule - All records concerning the retention of electronic copies of mail, or data derived mail, or data derived.	In full, 12/20/24	Yes	568

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Law v. BOP, 4:24-cv-06628-YGR

<p>45. Records and photographs provided to the Court regarding transfer in <i>CCWP v. US</i>, ECF No. 300 at 8 “Class counsel have relayed myriad complaints from various class members concerning the conditions of their transports. Among those are complaints that individual AICs sustained injuries during transit. The Court responded by ordering the identification of such AICs, cataloguing [SIC] of their complaints, immediate medical examinations upon arrival at new facilities, as well as photographic documentation of any injuries. The BOP has since produced to the Court, Special Master, and plaintiffs’ counsel a range of records and photographs for most of those AICs. “ ...“Class counsel will be provided with those pictures and are ordered to transmit the same to any attorney who may represent an AIC individually for review of the AIC, if appropriate, by their own physicians.”</p>	None		
<p>46. Records and photographs provided to the Court regarding transfer in <i>CCWP v. US</i>, ECF No. 300 at 11 “the BOP shall include with the above-referenced roster updates descriptions of actions taken to resolve the AICs’ concerns relative to transportation-related concerns, including lost property.”</p>	None	Yes	
<p>47. Records and photographs provided to the Court in <i>CCWP v. US</i>, No. 300 at 11 “the Court requires the BOP to provide a staffing report on each transferee institution with details on the number of budgeted, authorized positions and associated vacancies, broken down by department. The staffing report shall be provided in the first instance for the period since January 1, 2024 and shall be updated through the trial on this action unless otherwise ordered. Such monthly reports shall also address staffing augmentations.”</p>	In Part 2/21/25, Fully by 3/21/25	Yes	2/21/25, 32 pages, 3/21/25 7 pages
<p>48. Records and provided to the Court in <i>CCWP v. US</i>, in response to ECF No. 300 order “The BOP’s roster updates will also include information related to the existence of property and transportation related claims/issues as well as their resolution.”</p>	None	Yes	

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<p>49. Records and provided to the Court in CCWP v. US, in response to ECF No. 300 at 15 order “The BOP Western Regional Disciplinary Hearing Administrator shall audit FCI Dublin’s Unit Disciplinary Actions and Disciplinary Hearing Officer’s actions between April 25, and May 1, 2024. Necessary corrective actions shall be taken on incidents and associated disciplinary actions where due process and other errors occurred. To the extent such issues are identified, they shall be tracked via the above-mentioned roster.”</p>	<p>None</p>		
<p>50. Of transfer, particularly the bus videos mentioned in Court Order in CCWP v. US ECF No. 300 at 8 (“Special Master and Warden arranged for video surveillance cameras, with audio enabled, to be deployed on the remaining buses.”).</p>	<p>None</p>		