

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

SUNDAY HINTON, on behalf of herself and  
others similarly situated,

Plaintiff,

v.

DISTRICT OF COLUMBIA,

Defendant.

Civil Action No. 1:21-cv-1295-JDB

**SUPPLEMENTAL DECLARATION OF RACHEL CICUREL**

I, Rachel Cicurel, declare as follows:

1. I am a staff attorney at the Public Defender Service for the District of Columbia (PDS). I am one of the attorneys for Ms. Hinton in this matter. I also represent Ms. Hinton in a criminal matter in D.C. Superior Court.

2. On May 13, 2021, I was scheduled to have two legal calls with Ms. Hinton: one through the normal legal call request process, and one facilitated through Traci Outlaw. This was to ensure we were able to speak to Ms. Hinton between receiving the District of Columbia's opposition to Ms. Hinton's request for a Temporary Restraining Order (TRO), due at 11:59 pm last night, and our 4:00 pm deadline to file our reply brief today, May 13.

3. Starting at approximately 8:20 am this morning, May 13, I began calling every direct phone number I have to the Central Treatment Facility (CTF), to which Ms. Hinton was transferred yesterday afternoon, May 12, 2021. I had phone numbers for two CTF case managers; one of those numbers was out of service, and the other went to a case manager who, once he learned that our client was transgender, said I had to go through Ms. Reid for a call. He gave me Ms. Reid's number, which I called to no avail. I also called Ms. Outlaw directly

with no success. I additionally called a general line for CTF and asked for Lt. Hines, as Lt. Hines directed us to do yesterday to ensure Ms. Hinton would get a call with us today. I was told that Lt. Hines was not working until 3:00 pm.

4. I emailed Ms. Outlaw at 8:30 am asking for an earlier call if possible. Our call was scheduled to occur between 12:00 pm and 1:30 pm today, May 13, but I asked if Ms. Outlaw could possibly facilitate the call between 8:30 am and 10:30 am. I did not receive a response. My 8:30 am email to Ms. Outlaw is attached as Exhibit A.

5. My co-counsel Megan Yan from the ACLU-DC emailed Andy Saindon at the D.C. Office of the Attorney General (OAG) and the rest of the District's legal team at 9:10 am asking for a legal call in light of the 4:00 pm filing deadline. Mr. Saindon replied at 9:27 am that he would pass our request along to the Department of Corrections (DOC). The email exchange between Ms. Yan and Mr. Saindon is attached as Exhibit B.

6. At 12:00 pm, I began waiting to hear from Ms. Hinton via Ms. Outlaw. When I did not hear from either of them (by phone or email) by 1:00 pm, I emailed Ms. Outlaw at 1:08 pm to inquire about the status of the pending legal call that had been scheduled to occur between 12:00 pm and 1:30 pm today. My email exchange with Ms. Outlaw is attached as Exhibit C. I then called Ms. Outlaw at 1:10 pm. Ms. Outlaw said that she could no longer meet with Ms. Hinton because Ms. Hinton had been moved to CTF yesterday, May 12, and that she, Ms. Outlaw, was still at the Central Detention Facility (CDF). After I reiterated to Ms. Outlaw the importance of our team having a legal call with Ms. Hinton as early this afternoon as possible, Ms. Outlaw said she would contact the case manager supervisor (who I believe is Ms. Reid) and see if she could reach out to a case manager at CTF to set up a call with Ms. Hinton.

7. Following my call with Ms. Outlaw, I again called Ms. Reid at 1:20 pm. Ms. Reid answered and indicated that she knew Ms. Hinton was on the list for legal calls today, but that

such calls occur between 9:00 am and 6:00 pm, and she could not give me a time when Ms. Hinton would call. Ms. Reid said the case managers were on another unit facilitating calls at that time. I told Ms. Reid we were supposed to have a call with Ms. Hinton via Ms. Outlaw at noon, but were not aware (or made aware) that Ms. Hinton could no longer see Ms. Outlaw since Ms. Outlaw works at CDF and Ms. Hinton is now at CTF. Ms. Reid said she did not know anything about a call supposed to occur between our team and Ms. Hinton through Ms. Outlaw. I again told Ms. Reid the importance of our team being able to speak with Ms. Hinton before the 4:00 pm filing was due today. Ms. Reid said she would run our request by the Office of the General Counsel and see what they said about facilitating a call with Ms. Hinton.

8. At 1:18 pm, I again called the CTF case manager who had given me Ms. Reid's phone number this morning. I expressed to the case manager the importance of a legal call this afternoon, and he gave me the warden's number and suggested I try that directly. My attempts to reach the warden's office were not successful.

9. My co-counsel Scott Michelman of the ACLU-DC emailed Mr. Saindon and the rest of the District's legal team at 1:28 pm today, May 13, telling them that we still had not heard from Ms. Hinton, that we needed to speak to her prior to the 4:00 pm deadline in light of the factual assertions made by the DOC in its opposition, and that we were concerned about our client's access to counsel given what had occurred on May 12 with the DOC's request for Ms. Hinton to sign a waiver without counsel present. Mr. Michelman's email to the District's legal team is attached as Exhibit D.

10. Mr. Michelman and I then called the District's legal team at approximately 1:30 pm to follow up and ask directly about the difficulty we were having accessing a legal call with Ms. Hinton. We reached attorney Pamela Disney from OAG, who told us that she and her colleagues had passed along our requests to DOC, but that they could not give us a time the

call would occur. Ms. Disney said the DOC was “actively working on it,” but she did not know when we should expect to hear from Ms. Hinton. At that time, Mr. Michelman told Ms. Disney that he was concerned about our access to our client given the fact that they had given our client a waiver to sign yesterday, May 12, and when she asked to speak with her lawyer, they would not allow her to do so. At that time, Ms. Disney said Mr. Saindon had just then become available, and added him to the call. Mr. Saindon informed us that they were passing along our requests, and said he was in contact with Michelle Wilson of the DOC Office of the General Counsel about a legal call with Ms. Hinton. However, he said that we would probably hear about the call sooner than they would. I again gave my cell phone number to Mr. Saindon to ensure that the DOC had it.

11. Just after 3:00 pm, my co-counsel Steven Marcus from PDS called CTF to speak to Lt. Hines in the hopes of Lt. Hines facilitating a legal call prior to the 4:00 pm deadline. Mr. Marcus spoke to a DOC staff member who identified himself as Captain Bruce. Captain Bruce told Mr. Marcus that Lt. Hines would be in [to work] in an hour.

12. As of the time of this writing, 3:26 pm on May 13, 2021, we have not received a legal call, or any call, from Ms. Hinton on May 13.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, D.C. on May 13, 2021.



---

Rachel Cicurel

# Exhibit A

**From:** [Rachel Cicurel](#)  
**To:** [Outlaw, Traci \(DOC\)](#)  
**Subject:** Re: Sunday Hinton  
**Date:** Thursday, May 13, 2021 8:30:36 AM

---

Hi Ms. Outlaw,

If there is any way I could speak to Ms. Hinton early this morning (anytime between now and 10:30), I would really, really appreciate it.

Thanks so much,

Rachel

> On May 12, 2021, at 12:15 PM, Rachel Cicurel <[Rcicurel@pdsdc.org](mailto:Rcicurel@pdsdc.org)> wrote:

>

# Exhibit B

**From:** [Saindon, Andy \(OAG\)](#)  
**To:** [Megan Yan](#); [Rachel Cicurel](#); [Scott Michelman](#)  
**Cc:** [Marietta Catsambas](#); [Amarillas, Fernando \(OAG\)](#); [Disney, Pamela \(OAG\)](#); [Heath, Brendan \(OAG\)](#); [Steven Marcus](#)  
**Subject:** RE: Hinton--TRO  
**Date:** Thursday, May 13, 2021 9:26:38 AM

---

Hi Megan,

We will pass along your request to DOC.

--Andy

---

**From:** Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>  
**Sent:** Thursday, May 13, 2021 9:10 AM  
**To:** Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)>; Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>; Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>  
**Cc:** Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>; Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>; Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>; Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>  
**Subject:** RE: Hinton--TRO

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Hi Andy and all,

Thank you for your assistance in facilitating a call with our client yesterday. Would you be able to facilitate another call this morning, as early as possible? We have requested a legal call with Ms. Hinton, but given the unpredictable nature of those calls and the 4:00p.m. filing deadline, we'd like to ensure we speak with her as soon as possible. Please let us know. Thank you.

Best,  
Megan

---

**From:** Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)>  
**Sent:** Wednesday, May 12, 2021 6:16 PM  
**To:** Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>; Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>  
**Cc:** Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>; Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>; Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>; Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>; Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>  
**Subject:** Re: Hinton--TRO

Thanks for letting us know.

---

**From:** Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>



**Sent:** Wednesday, May 12, 2021 6:14:47 PM

**To:** Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)>; Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>

**Cc:** Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>; Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>; Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>; Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>; Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>

**Subject:** RE: Hinton--TRO

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Andy - We were able to speak with our client and finished just a short while ago.

We are not withdrawing the TRO.

Scott

Scott Michelman

Pronouns: he, him, his (← Why am I listing my pronouns? Learn more here.)

Legal Director

ACLU of the District of Columbia

915 15th Street NW, Second Floor

Washington, D.C. 20005

(202) 601-4267

[smichelman@acludc.org](mailto:smichelman@acludc.org)

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-----Original Message-----

From: Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)>

Sent: Wednesday, May 12, 2021 4:37 PM

To: Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>; Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>

Cc: Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>; Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>; Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>; Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>; Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>

Subject: RE: Hinton--TRO

Scott,

DOC tells me that Ms. Hinton is at CTF but not yet in her cell. They will let us know as soon as they can set up a call.

--Andy

-----Original Message-----

From: Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>

Sent: Wednesday, May 12, 2021 4:34 PM

To: Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)>; Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>

Cc: Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>; Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>; Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>;

Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>; Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>

Subject: RE: Hinton--TRO

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Andy - any update on when you might be able to coordinate a client call today? Obviously on our side we're in limbo until we can speak with our client.

Thanks,  
Scott

Scott Michelman

Pronouns: he, him, his (← Why am I listing my pronouns? Learn more here.) Legal Director ACLU of the District of Columbia

915 15th Street NW, Second Floor

Washington, D.C. 20005

(202) 601-4267

[smichelman@acludc.org](mailto:smichelman@acludc.org)

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-----Original Message-----

From: Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)>

Sent: Wednesday, May 12, 2021 2:22 PM

To: Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>

Cc: Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>; Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>; Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>;

Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>; Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>;  
Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>  
Subject: RE: Hinton--TRO

DOC notes that Ms. Hinton is currently being moved, and the agency will coordinate a call when it is possible to do so.

-----Original Message-----

From: Saindon, Andy (OAG)  
Sent: Wednesday, May 12, 2021 2:17 PM  
To: Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>  
Cc: Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>; Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>; Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>; Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>; Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>; Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>  
Subject: RE: Hinton--TRO

I have already forwarded your request to DOC, who will be in touch.

-----Original Message-----

From: Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>  
Sent: Wednesday, May 12, 2021 2:15 PM  
To: Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)>  
Cc: Scott Michelman <[smichelman@acludc.org](mailto:smichelman@acludc.org)>; Megan Yan <[myan@acludc.org](mailto:myan@acludc.org)>; Marietta Catsambas <[mcatsambas@acludc.org](mailto:mcatsambas@acludc.org)>; Amarillas, Fernando (OAG) <[fernando.amarillas@dc.gov](mailto:fernando.amarillas@dc.gov)>; Disney, Pamela (OAG) <[Pamela.Disney@dc.gov](mailto:Pamela.Disney@dc.gov)>; Heath, Brendan (OAG) <[Brendan.Heath@dc.gov](mailto:Brendan.Heath@dc.gov)>; Steven Marcus <[SMarcus@pdsdc.org](mailto:SMarcus@pdsdc.org)>  
Subject: Re: Hinton--TRO

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Hi Andy,

Would it be possible to set up a video call for me to speak with Ms. Hinton today?

Thanks,

Rachel

> On May 12, 2021, at 10:56 AM, Saindon, Andy (OAG) <[andy.saindon@dc.gov](mailto:andy.saindon@dc.gov)> wrote:  
>

>  
>  
>  
> Microsoft Teams meeting  
> Join on your computer or mobile app  
> Click here to join the  
> meeting<> PIN<> Help<>  
>  
>

# Exhibit C

**From:** Rachel Cicurel  
**To:** [Outlaw, Traci \(DOC\)](#)  
**Subject:** RE: Sunday Hinton  
**Date:** Thursday, May 13, 2021 1:08:14 PM

---

Hi Ms. Outlaw,

I am still waiting on my call from Ms. Hinton. Can you please have her call me? Thanks so much.

Rachel

---

**From:** Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>  
**Sent:** Wednesday, May 12, 2021 2:15 PM  
**To:** Outlaw, Traci (DOC) <[traci.outlaw@dc.gov](mailto:traci.outlaw@dc.gov)>  
**Subject:** Re: Sunday Hinton

Hi there,

Tomorrow works great for me. Noon would be better than 1:30.

Thanks!

Rachel

On May 11, 2021, at 10:48 AM, Outlaw, Traci (DOC) <[traci.outlaw@dc.gov](mailto:traci.outlaw@dc.gov)> wrote:

Good Afternoon,

If you are available on Thursday 5/13 between 12 and 130pm I will have Ms. Hinton available to speak with you. Please confirm your availability, thank you

---

**From:** Rachel Cicurel <[Rcicurel@PDSDC.ORG](mailto:Rcicurel@PDSDC.ORG)>  
**Sent:** Thursday, May 6, 2021 10:21 AM  
**To:** Outlaw, Traci (DOC) <[traci.outlaw@dc.gov](mailto:traci.outlaw@dc.gov)>  
**Subject:** RE: Sunday Hinton

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Hi Ms. Outlaw,

Thanks so much again for taking the time to talk me through everything on Tuesday.

I've been relaying some of the information to my co-workers and just wanted to follow up to make sure I had everything right.

Also, would it be possible to have Ms. Hinton call me today? I totally understand if not, but I thought I'd check.

Thanks again,

Rachel

---

**From:** Rachel Cicurel  
**Sent:** Tuesday, May 04, 2021 2:02 PM  
**To:** 'Traci.Outlaw@dc.gov' <[Traci.Outlaw@dc.gov](mailto:Traci.Outlaw@dc.gov)>  
**Subject:** RE: Sunday Hinton

Hi Ms. Outlaw,

Thanks so much for calling me back so quickly and taking the time to talk to me today. I know I asked a lot of questions, and I really appreciate you walking me through the answers. I just want to make sure I actually understand all of this, especially so I can help Ms. Hinton and future clients navigate things at the jail. Let me know if I've got this all right:

There's no specific transgender unit at the D.C. Jail, but there is a transgender housing committee. You are a member of that committee. At the transgender housing committee, there are certain criteria to determine if individuals should be housed based on their sex assigned at birth or their gender expression. Two of these specific criteria are (1) whether or not the individual has had full reassignment surgery; and (2) whether or not the individual has ever been in a heterosexual relationship.

These are of particular concern because a transgender woman may have a working p\*\*s. You also gave me an example of a transgender man who came to the jail after taking hormones; he had a full beard, looked like a man, and wanted to be housed with the men. However, you explained that he could not be housed with the men because he still had a functioning v\*\*na. And if, for example, he had a menstrual cycle while at the jail, he couldn't be in a cell with a man while changing his pad.

Even if everyone on the transgender housing committee agrees that a person is best off housed in a unit consistent with that person's gender expression, the decision about whether or not a person is housed based on their sex assigned at birth or gender expression is up to the warden. And even if, for example, the warden agrees that a transgender woman can be housed in a women's unit, the transgender woman would still need to be secluded from the other women; she could not be housed on the general unit with other women. The same would apply if a transgender man was permitted to be housed on a men's unit; he would still need to be secluded from other

men.

The transgender housing committee has not met since prior to COVID. The last time the committee met was in January 2020. The committee has to be led by DOC staff.

As I mentioned on the phone, Ms. Hinton was listed as female on the lockup list. I voiced to you my confusion as to how someone listed on the lockup list as female could end up being held in a male unit. You explained that the female designation probably came from the Marshals Service, but that upon arrival at DOC, individuals have a medical examination which can indicate how a person was born and whether or not they have certain genitalia.

Thanks so much again for taking the time to walk me through this and to check on Ms. Hinton. As I mentioned on the phone, Ms. Hinton is more than welcome to call me anytime.

Rachel

---

**From:** Rachel Cicurel  
**Sent:** Tuesday, May 04, 2021 12:13 PM  
**To:** 'Traci.Outlaw@dc.gov' <[Traci.Outlaw@dc.gov](mailto:Traci.Outlaw@dc.gov)>  
**Subject:** Sunday Hinton

Hi Ms. Outlaw,

I am counsel for Sunday Hinton, DCDC No. 312513, who I believe you have met with since she was locked up last week at the jail. I was hoping to touch base with you about a few things. Would you be able to chat briefly?

Thanks so much in advance!

Rachel

-----

**Rachel Cicurel**  
Staff Attorney | Trial Division  
Public Defender Service for the District of Columbia  
633 Indiana Ave., NW | Washington, D.C.  
Direct: (202) 824-2774 | Fax: (202) 824-2776

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# Exhibit D

**From:** [Scott Michelman](#)  
**To:** [Saindon, Andy \(OAG\)](#); [Disney, Pamela \(OAG\)](#); [Heath, Brendan \(OAG\)](#); [Amarillas, Fernando \(OAG\)](#)  
**Cc:** [Rachel Cicurel](#); [Steven Marcus](#); [Art Spitzer](#); [Megan Yan](#); [Scott Michelman](#)  
**Subject:** Hinton case - client access  
**Date:** Thursday, May 13, 2021 1:27:48 PM  
**Importance:** High

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Andy and D.C. team – We still haven’t been able to speak with our client today. Rachel has called over and over.

Obviously our brief is due at 4 and given the factual assertions DOC has made we need to speak with her further.

Let me say also that given your client’s conduct in this matter so far – i.e., procuring a “waiver” from our client about the subject matter of this lawsuit without involving her counsel – I think the court will be very troubled if we have to go to the court and ask for its assistance in communicating with her.

Thank you for your efforts to procure a conversation forthwith. I will also call you right now.  
Scott

Scott Michelman

*Pronouns: he, him, his (← Why am I listing my pronouns? Learn more [here](#).)*

Legal Director

ACLU of the District of Columbia

915 15th Street NW, Second Floor

Washington, D.C. 20005

(202) 601-4267

[smichelman@acludc.org](mailto:smichelman@acludc.org)

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