

4. Persons who will Support Petitioners' Responses

Each individual Petitioner will support the information provided in his or her response.

The responses of the organizational petitioners will be supported as follows:

Prisoners Legal Services: Executive Director Leslie Walker

Stern, Shapiro Weissberg and Garin: Attorney Patricia Garin

Disability Law Center: Attorney Richard Glassman

Essex County Bar Advocates: Attorney David Hallinan, Executive Director, and Deborah Pollock, Administrator.

Prisoners' Rights Clinic of Northeastern Law School: Patricia Garin and Wally Holohan, Co-Directors

5. Additional responsive document identified

The Petitioners have identified an additional document which is responsive to GTL requests nos. 1-3 and 1-17, as well as Securus 1-49, but is subject to attorney-client privilege and constitutes confidential attorney work product. On April 24, 2014 Attorney Bonita Tenneriello created an internal document in which Prisoners Legal Services staff have been detailing reports on an ongoing basis by clients in Massachusetts Correctional facilities of problems with telephone service, identifying each client by name and stating the particulars of their problem. The authors and recipients are attorneys and paralegals at Prisoners Legal Services. It is formatted as a google document shared only between PLS staff.

6. Printing and scanning error corrected

Due to a print shop error, the documents submitted by Petitioners Northeastern University Prisoners' Rights Clinic (NUSL), Essex County Bar Association and James Logar in response to GTL's requests were all combined in the NUSL file. The Petitioners now submit each of these documents under separate heading.

Dated: May 23, 2014.



Bonita Tenneriello
Elizabeth Matos
on behalf of Petitioner PLS and all other Petitioners
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail (by hand)

on May 23, 2014

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