

1 A An extension cord.

2 Q Where does the extension cord run?

3 A Across the outer walkway.

4 Q The catwalk you told us about?

5 A Yes.

6 Q Have you ever been in the cell block area during the
7 summer?

8 A Yes, sir.

9 Q On the hot days, how high would you estimate that the
10 temperature gets?

11 A It would, I guess, be over 100; if it had been 100 outside,
12 it would be that hot or hotter in there.

13 Q If you were putting in an adjective or adverb to describe
14 the heat in there for the inmates, how would you describe it?

15 A It would be very hot.

16 Q Make them fairly uncomfortable?

17 A Yes, sir.

18 Q Does the jail staff have any way to reduce the temperature
19 once it gets that high?

20 A Just through the ventilation system. What we have, the
21 overhead vents that pull the air through -- circulation system

22 Q How effective is that?

23 A Well, I don't know how effective it's going to be during
24 hot weather. We found they have been inoperative since the
25 jail was built. There was some up there and the motors were

1 burned out and nobody knew they existed until late last year.
2 He discovered a switch and a wire -- they repaired those.
3 During hot weather, I have no idea how effective they are.

4 Q Are you familiar with the plumbing at the jail?

5 A Yes.

6 Q Do you ever experience problems with the plumbing?

7 A Yes.

8 Q Describe some of those problems.

9 A Well, basically, the valves to the commode and washbasin
10 is push button type, something you can't turn and leave open.
11 These type valves you push and cut back off are rather
12 expensive and hard to find. Some of the shower buttons run
13 as high as two or three hundred dollars just for a valve,
14 and it takes sometimes two or three months to obtain them.
15 We have trouble with drainage then. They evidently were too
16 small to begin with and the prisoners will throw articles
17 in there and stop it up and it will flood from time to time.

18 Q If the toilet gets stopped up, how long typically does
19 it take to repair?

20 A We make repairs as quick as we can get someone down
21 there right now. As I said, it happens from time to time.
22 It's just a matter -- as it stops up or something happens --
23 to try to get someone in. If it's a problem with a shower,
24 like parts are involved, sometimes it may take two or three
25 months.

1 would be an incident report or something.

2 Q About the fans, you testified that the prisoners or
3 inmates are allowed fans, personal fans?

4 A Yes, sir.

5 Q In the past even with the use of the personal fans, does
6 the temperature still rise up in the hundred degree range
7 in the summertime?

8 A Yes, sir.

9 THE COURT: Wait just a minute, before we
10 leave those wires running across the catwalk. I understood
11 you to say that you thought it would constitute a safety
12 hazard if outlets were provided inside the cells. A
13 suggestion has been made that conduit PVC pipe with some
14 plug outlets be run just outside the cells in the catwalk.
15 Is that feasible or not?

16 THE WITNESS: Possibly could come from overhead,
17 up and over and back down; it's possible they could.

18 MR. PINCKNEY, continuing:

19 Q Plug into it?

20 A Yes, sir, it could be.

21 Q The ventilation system, again, you testified you discovered
22 a switch that can be used?

23 A There was also the motors, it never was used or burned out
24 when it was put in. We repaired that last fall. How much
25 difference -- that, I think, was the problem, one of the main

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1 reasons there was no air at all. The fan blowing would do
 2 no good because the air was not coming through the jail itself.
 3 And this changed the circulation of it considerably. As far
 4 as how much, I have no idea until hot weather gets here.

5 Q How did you discover that ventilation system?

6 A We asked the electricians to check on this and they got
 7 up on the roof and we told them where you could see where the
 8 vents were on the roof. And they went up and checked among
 9 some things and said it was inoperative since the jail was
 10 there probably.

11 Q What problems had you to have the electrician come in?

12 A The heat, the Grand Jury.

13 Q That kind.

14 A Both kinds.

15 Q Part of your testimony on cross-examination involved the
 16 named plaintiff in this case, Mr. Douglass.

17 Would you mind explaining to us his specific request for
 18 an attorney?

19 A No, he didn't request an attorney. He requested the
 20 Tennessee Code. You're talking about the most recent request
 21 by Douglas?

22 A Right.

23 Q He wanted access to the legal library, not an attorney.

24 Q He didn't ask to see Ms. Kay?

25 A No.

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