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NEW ORLEANS, LA 70158

KATIE SCHWARTZMANN
LEGAL DIRECTOR

November 29, 2010

Iberia Parish Jail
Attn. Warden Hayes
3618 Broken Arrow Road
New Iberia, Louisiana 70560

Re: Inmate Reginald Peters
Administrative Remedy Procedure

Via: U.S. Mail and facsimile

Warden W. Hayes,

This is a grievance seeking an administrative remedy. An administrative remedy is sought because there are unlawful conditions in the Iberia Parish Jail that are affecting Reginald Peters.

This request is an **EMERGENCY** request. We are requesting expedited consideration. As such, a response is expected to be received by the third calendar day after the date of filing of this request, per Administrative Remedy Program Policy Statement VIII.

Inmate Reginald Peters is suffering serious medical problems due to the policies and procedures of the Iberia Parish Jail. Below is a non-exclusive list of the ways of which the policies and procedures have injured and been a burden on Inmate Reginald Peters, due to his disability. The following shall be considered to be separate and individual grievances, which will be placed on this single Administrative Remedy Request because the nature of the grievances are closely related.

1. Mr. Reginald Peters is unable to maneuver in his cell. Mr. Reginald Peters requires the use of a wheelchair, which shall be reasonably accessible to him as needed.
2. Mr. Reginald Peters is unable to perform any self-maintenance. For instance, Mr. Peters cannot bathe himself, nor can he wipe himself after a bowel movement. He is required to seek assistance of other prisoners in performing these functions. When he cannot get the assistance he must attempt such care himself. Because he is unable to provide such care for himself, he has developed rashes and other skin infections.
3. The policy of the jail to force Mr. Peters to ask other prisoners for intimate, sensitive care is creating a hostile living environment for him.
4. Mr. Reginald Peters needs assistance getting in and out of bed. Because of the lack of assistance, he has often times slept on the floor.
5. Mr. Reginald Peters needs treatment and therapy to halt the rapid deterioration of his body and his life. His muscles are atrophying at an alarming rate. Since admission to Iberia Parish Jail his feet have begun to curl up and he has largely lost use of his arms.

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We are filing this grievance on behalf of Mr. Peters at his request. This is consistent with the Prison Litigation Reform Act, which allows grievances to be filed on behalf of prisoners needing assistance. Mr. Peters' muscle control has deteriorated to such a point at which he has difficulty writing and controlling his arm movement. Once again, it is imperative that this Administrative Remedy Request be considered an **EMERGENCY**. All of the grievances listed above are a threat to Mr. Peters' immediate health, welfare, and life.

We are requesting that Mr. Peters be provided a wheelchair, that he be provided with nursing and medical care to allow him to shower and clean himself after a bowel movement, that he not be forced to rely upon assistance of other prisoners for these things, that he be provided medical care for the skin conditions that have developed as a result of the denial of this care, that he be provided with assistance in moving into and out of bed, that he never be forced to lie on the floor, and that he be provided medical attention to slow or retard the atrophy of his muscles.

I look forward to receiving your response within the next three calendar days. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Katie Schwartzmann". The signature is written in black ink and extends to the right with a long horizontal line.

Katie Schwartzmann
Legal Director