

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

EDWARD BRAGGS, et al.,)
)
 Plaintiffs,)
)
 v.)
)
JEFFERSON DUNN, in his official)
capacity as Commissioner)
of the Alabama Department of)
Corrections, et al.,)
)
)
 Defendants.)

CIVIL ACTION NO.
2:14-CV-00601-MHT-JTA
Judge Myron H. Thompson

**PLAINTIFFS’ REPLY TO DEFENDANTS’ RESPONSE TO THE
COURT’S PHASE 2A ORDER ON CORRECTIONAL STAFFING
REPORTING (DOC. 2703)**

On December 13, 2019, the Court ordered the Parties to submit a joint report including: (1) total numbers of basic correctional officers (“BCOs”), correctional

Employed

both the Savages' correctional staffing analysis and the Warren Averett Report. *Braggs v. Dunn*, 2:14-cv-601-MHT, 2018 WL 7106346 at *1 (M.D. Ala. Feb. 20, 2018). Plaintiffs do not object at this time to BCOs filling some posts previously designated for COs, as recommended by Warren Averett. However, the Savages' correctional staffing analysis makes no mention of BCOs. *See* Doc. 1813-1. Meg Savages' December 20, 2019 declaration states only that BCOs may fill all CO posts "except for those posts requiring firearms." Doc. 2703-4 at ¶ 10. The Savages'

~~Ms. (11) 19 015310 (5) 43 (1) 3 (1) 9 (7) 5.739 (E) 3 (1) 3 0231.9 (4) 402521 (67) 51 (2018) 735 (S) 0.54554~~

incarcerated people. Doc. 2703-2 (

Dated: January 3, 2020

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 3rd day of January, 2020 electronically filed the foregoing with the clerk of court by using the CM/ECF system, which will send a notice of electronic filing to the following:

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