

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

DE'JUAN THOMAS,  
Plaintiff,

V. 3:17-cv-01595-SDD-EWD

SALLY GRYDER, JAMES LEBLANC,  
JERRY GOODWIN, DOES 1-10,  
Defendants.

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BRIAN McNEAL,  
Plaintiff,

V. No. 18-cv-00736-JWD-EWD

LOUISIANA DPS&C, et al.  
Defendants.

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ELLIS RAY HICKS,  
Plaintiff,

V. No. 19-108-SDD-RLB

LOUISIANA DPS&C, et al.  
Defendants.

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

RODNEY GRANT,  
Plaintiff,

V. Case No. 17-cv-2797-NJB-DEK

MARLIN GUSMAN, et al.  
Defendants.

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1                   30 (b) (6) DEPOSITION OF THE LOUISIANA  
2 DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS,  
3 through its designated representative, ANGELA  
4 WHITTAKER, given in the above-entitled cause,  
5 pursuant to the following stipulation, before  
6 Sandra P. DiFebbo, Certified Shorthand Reporter, in  
7 and for the State of Louisiana, at the Louisiana  
8 Department of Public Safety & Corrections, 504  
9 Mayflower Street, Baton Rouge, Louisiana, on the  
10 31st day of May, 2019, commencing at 10: 23 a.m.

11 APPEARANCES:

12  
13                   WILLIAM MOST,  
14                   ATTORNEY AT LAW  
15                   201 St. Charles Avenue  
16                   Suite 114, #101  
17                   New Orleans, Louisiana 70170  
18                   Representing the Plaintiffs

19                   LOUISIANA DEPARTMENT OF JUSTICE  
20                   OFFICE OF THE ATTORNEY GENERAL  
21                   BY: JAMES "GARY" EVANS, ATTORNEY AT LAW  
22                   JEFFERY "BEAU" WHEELER, ATTORNEY AT LAW  
23                   HEATHER HOOD, ATTORNEY AT LAW  
24                   ELIZABETH DESSELLE, ATTORNEY AT LAW  
25                   1885 N. Third Street  
                    Baton Rouge, Louisiana 70802  
                    Representing the Defendants

26 Reported By:

27                   Sandra P. DiFebbo  
28                   Certified Shorthand Reporter  
29                   State of Louisiana

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E X A M I N A T I O N

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S T I P U L A T I O N

It is stipulated and agreed by and between Counsel for the parties hereto that the deposition of THE LOUISIANA DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS, through its designated representative, ANGELA WHITTAKER, is hereby being taken pursuant to the Federal Rules of Civil Procedure for all purposes in accordance with law;

That the formalities of reading and signing are specifically reserved;

That the formalities of sealing, certification, and filing are hereby specifically waived.

That all objections, save those as to the form of the question and responsiveness of the answer are hereby reserved until such time as this deposition or any part thereof is used or sought to be used in evidence.

\* \* \* \* \*

Sandra P. DiFebbo, Certified Shorthand Reporter, in and for the State of Louisiana, officiated in administering the oath to the witness.

1           ANGELA WHITTAKER, 504 Mayflower Street,  
2           Baton Rouge, Louisiana, 70802, having been  
3           first duly sworn, was examined and testified on  
4           her oath as follows:

5           EXAMINATION BY MR. MOST:

6           Q.     Good morning, Miss Whittaker. My name is  
7           William Most. I represent the plaintiffs in the  
8           four cases that we're here for today. This is a  
9           question for your attorney.

10          MR. MOST:

11                 Mr. Evans, can we stipulate that the  
12                 deposition today was properly noticed,  
13                 and the court reporter is duly  
14                 qualified?

15          MR. EVANS:

16                 We can.

17          MR. MOST:

18                 Great.

19          BY MR. MOST:

20                 Q.     Miss Whittaker, would you state your name  
21                 and title for the record?

22                 A.     Angela Whittaker, Executive Management  
23                 Advisor.

24                 Q.     And you work here at the Department of  
25                 Corrections?

1 interventions, right?

2 A. Yes, you're right.

3 Q. So this approximately 79-day number  
4 represents the DOC's, to the best of its knowledge  
5 in 2012, about how long it was taking for documents  
6 to wait at the DOC to be calculated?

7 A. Correct.

8 Q. This Six Sigma investigation found a lot  
9 of overdetention as a baseline, right?

10 A. Correct.

11 Q. And with some tinkering modestly improved  
12 that overdetention, correct?

13 A. Correct.

14 Q. But there was still a lot overdetention  
15 even after the interventions of the Six Sigma  
16 process, correct?

17 MR. EVANS:

18 Object to form. You can answer.

19 THE WITNESS:

20 Correct.

21 BY MR. MOST:

22 Q. A lot of human beings were held in prison  
23 past the point where their sentence was complete,  
24 correct?

25 A. Correct.