

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT DEPT.  
DOCKET NO. 2084CV00295

CARL LAROCQUE, ROBERT SILVA- )  
PRENTICE, TAMIK KIRKLAND, )  
MASSACHUSETTS ASSOCIATION )  
OF CRIMINAL DEFENSE LAWYERS, )  
and COMMITTEE for PUBLIC )  
COUNSEL SERVICES, )

Plaintiffs, )

v. )

THOMAS TURCO, Secretary of the )  
Executive Office of Public Safety and )  
Security; CAROL A. MICI, )  
Commissioner of the Massachusetts )  
Department of Correction; and STEVEN )  
KENNEWAY, Superintendent of Souza- )  
Baranowski Correctional Center; )

Defendants. )

Affidavit of Ann Grant

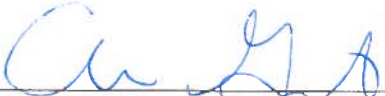
I, Ann Grant, attorney for Mahamadou Kante, an inmate currently residing in South RHU of Souza-Baranowski Correctional Center, state the following under the pains and penalties of perjury:

1. I visited Mr. Kante on February 4, 2020. He informed me that he had been unable to send legal mail to me or to his other legal representatives. He asked me to take documents to pass on to his other legal representatives; the guards would not permit me to take the documents.
2. Mr. Kante left me a message at 8:00 p.m. on February 6, 2020, so I visited Mr. Kante again on February 7, 2020. He told me that after being denied showers for three days, the people on his unit engaged in civil disobedience and covered the windows of their cells during count. As a result, he was hit with a baton, pepper sprayed six to seven times, pushed so that he hit his head on the bed and fell to the floor, handcuffed, and struck in

the scrotum and back with a gloved fist. After he was removed from his cell, his legal paperwork was taken out of his cell and not returned to him

3. He is also still unable to send legal mail from his own account. He has been told there is a "144 freeze" which somehow prevents him from sending legal mail. I was permitted to give Mr. Kante four postage paid envelopes addressed to me as well as writing paper.

The above is true to the best of my information and belief. Signed under the pains and penalties of perjury.

  
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Ann Grant, BBO #690035

Dated: February 7, 2020