

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

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)	
MAURA O’NEILL, as administrator of the Estate)	
of Madelyn E. Linsenmeir,)	
)	
Plaintiff,)	
)	C.A. No. 20-30036-MGM
v.)	
)	
CITY OF SPRINGFIELD, <i>et al.</i>)	
)	
Defendants.)	
)	

**PLAINTIFF’S MOTION TO COMPEL PRODUCTION OF
VERBATIM ELECTRONIC RECORDINGS OF WITNESS STATEMENTS
AND CLINICAL MORTALITY REVIEW RECORDS**

Pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37.1, plaintiff Maura O’Neill, in her capacity as administrator for the Estate of Madelyn E. Linsenmeir (the “Estate”), is hereby moving to compel production by defendant Hampden County Sheriff’s Department (“HCSD”) of:

- (a) 26 verbatim electronic recordings containing statements by third party witnesses who were incarcerated with Madelyn at HCSD’s Western Massachusetts Regional Women’s Correctional Center (the “WCC”); and
- (b) Records relating to HCSD’s “Clinical Mortality Review” performed by HCSD about a month after Madelyn died.

These documents are reflected in items 1, 2, and 13 listed on HCSD’s Privilege Log, which accompanies this motion as Exhibit G.

As grounds, the Estate refers to the memorandum accompanying this motion.

April 6, 2022

Respectfully submitted,

/s/ Daniel L. McFadden

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Local Rule 7.1 and 37.1 Certification

I hereby certify that counsel for the Estate and counsel for HCSD conferred on multiple occasions in a good faith effort to narrow or resolve the issues raised by this motion, including by telephone on February 9 & 18 and March 4 & 11. On these calls, HCSD was represented by attorney Thomas Day, and the Estate was represented by attorneys Daniel McFadden, Areeba Jibril, and/or Michael Nzoiwu. The calls lasted between 20 and 90 minutes. HCSD opposes this motion.

Date: April 6, 2022

/s/ Daniel L. McFadden
Daniel L. McFadden