

Clip#	Title Card	Deposition time code	Content
1	Lack of due process	9:32:49- 9:33:07	<p>Q. Let me ask you: When -- when -- when committee was making decisions to retain you in SHU --22</p> <p>Q. Okay. So tell me, what -- what was the -- what was the terminology that was being used?</p> <p>A: "They never provided you with no documentation. They didn't say, "Hey, we're going to retain you based on membership, but we're going to provide you with the documents that we all are going to rely on to give you an opportunity to address. None of that ever occurred."</p>
2	Conditions in SHU	9:39:35- 9:39:51	<p>Q: What were the -- can you give me a sense of in connection with that testimony, what were the conditions of confinement at that time? And we're talking about the early '80s.</p> <p>A: "Again, you had -- you had no access to the law library. The conditions, the cells -- you know, the cell was nasty. You know, it -- just deplorable conditions. The food, et cetera, and the ventilation, all of that."</p>
3	Sensory Deprivation	12:13:44- 12:14:11	<p>Q: You claim in this case you are experiencing medical conditions because of your confinement in the SHU at Pelican Bay.</p> <p>A: "Sensory -- sensory deprivation. I mean, I done suffer -- you know what I'm saying? I'm suffering from short-term memory loss, long-term memory loss."</p>
4	Vision issues	12:14:52- 12:15:28	<p>Q: With this double vision, who diagnosed you? Q: Did this specialist ay your double vision had been caused by your retention in the SHU?</p> <p>A: "Well, it's -- what -- what was said was that these doors with these perforated holes have caused my vision to be distorted, and that this diagnosis should have been, you know, a lot -- caught a lot earlier."</p>
5	Medical treatment	12:16:16- 12:19:40	<p>Q: Are you taking any medication?</p> <p>A: No</p> <p>Q: Have you asked for it?</p> <p>A: Yes</p> <p>Q: And Pelican Bay has not provided it to you?</p> <p>A. No. In fact, in 2008, they -- they discovered I had two enlarged thyroid glands. I had surgery. They removed partially my right one, stating they was going to monitor the left one. The left one get bigger, then they was going to decide what they was going to do with that. Well, the left one has gotten larger. One of the doctors here suggest -- recommended that I have another CAT scan. At that time, Dr. Sayre denied his request.</p> <p>To this day, I'm not on any kind of thyroid medication, nothing.</p> <p>A. Exactly. The dry skin, the dry scalp, the bleeding scalp.</p> <p>Well, since I got moved to the short corridor in 2006, the condition started getting real -- getting worse. So I -- I go see the doctor. Well, she was a family practitioner.</p> <p>"I'm constantly complaining about, "Hey, my -- my throat is bothering me. My skin is</p>

			<p>bothering me. I'm itching, I'm scratching," all this here."</p> <p>"Her response was, "Well, Mr. Redd, you know, you Africans, you know, may drink too much coffee." I said, "I don't drink coffee. I drink Kool-Aid."</p>
6	Conditions in SHU	12:58:27- 12:59:15	<p>Q: What else is different? You mentioned there might be some issues with respect to getting different amounts of yard time?</p> <p>A: "The -- the condition of food is -- has gotten worse. All these kind of things just compound over there in the D facility short corridor.</p> <p>Q: And why is that in your opinion?</p> <p>A: I think it's designed to continue to inflict the torture on us. To try to get people to debrief or -- you know what I'm saying? That's my opinion.</p>
7	Stress	13:04:24- 13:06:13	<p>Q: You have been incarcerated for quite some time. Would you agree that there is a general stress related to the fact of incarceration?</p> <p>A: Yes, I believe you have stress. I believe this place here compounds that stress ten times more."</p> <p>Q: What can you attribute that stress to></p> <p>A: The -- the environment. The cells, you know. The lack of yard, the lack of sunlight. You know, lack of social contact. Being able, you know, to --</p> <p>Q: Do you feel like there were times when you were stressed and not living in SHU?</p> <p>A: In 1982, I was diagnosed with high blood pressure. I was given one medication. Here I am on several high blood pressure medications for a long time. The medication they are giving me do cent even control my blood pressure...(explains more) This environment causes that.</p>
8	Insomnia	13:12:45- 13:14:22	<p>Q: Let's talk about what you allege in this case to be medical conditions that have been exacerbated by your confinement in the SHU.</p> <p>A: My insomnia.</p> <p>I sleep no more than maybe about three hours. Three hours total."</p> <p>Q: When did you start getting less sleep?</p> <p>"I started -- really started noticing all this here like around about '99, '98, you know. I started noticing my lack of sleep. I started noting my anxiety level. You know, a little paranoia, where, you know, every time you hear the doors open and close, you're jumping up.</p> <p>You know, all that kind of stuff right there."</p>
9	Impact on mental facilities over time	14:17:26- 14:18:19	<p>Q: How do you feel now about what you wrote there? (Referring to a document that Redd wrote in the 1990s)</p> <p>" Well, I -- I feel when I wrote that, my mind was a lot sharper. I wasn't having -- having the problems I'm having now. And I think today, like I said, I'm -- I'm starting to experience a lot more from being back here longer.</p> <p>But I -- I try to use that somewhat as therapeutic to keep me from, you know, banging my head against the walls, you know, losing my sanity, when you see so many people around you kind of like losing their sanity, you know. We talk to ourselves. And you</p>

			<p>know --" (254)</p> <p>Q: In Pelican Bay?</p> <p>A: Yes, in Pelican Bay</p>
10	Psychological concerns	14:33:58- 14:37:49	<p>Q: What else would you like to tell me?</p> <p>"The violent dreams I had. The despair I had. You know, like I say, you're feeling that you're being attacked or you want to attack somebody. You know, you're getting mad at little small things. You -- you become real irritable, you know.</p> <p>Sometimes, you know, you -- my muscles tighten up and I'm -- you know, you're so mad, you know, you just got to try to, you know, sit back and take a little break for a second, you know."</p> <p>Not one violent dream. I didn't even have dreams -- I didn't even have thoughts of looking up at the top of my bunk and you see cracks on the bunk and say, "Hey, man, if they got a little earthquake, this wall -- this top bunk is going to fall down on you. You know, you start getting a little nervous thing. I never had them kind of thoughts. I never had thoughts that a cop may come to work uncontrolled, might just be mad and go postal and just start shooting all of us in our cell. You know, I never used to have them kind of thoughts. You know, but now you started, "Hey, man, is this a possibility?" You know?"</p> <p>"Well, I'm saying, I'm feeling -- you know, like -- like I say, you become to the point where you feel that, you know, that everything around you becomes numb sometimes. Just -- you -- you -- you numb up. You try to, you know, close your feelings off where you don't try to feel nothing. You feel like there's no hope."</p> <p>Q: What are your expectations for this litigation?</p> <p>"Well, I'm hoping that the conditions change back here in the SHU. I'm hoping -- I'd like to hope that the SHU would shut down. I don't think no human being should have to live in the SHU, especially as long as we have lived in the SHU, you know."</p> <p>"Yeah. I might punch the wall, you know. I might throw my cup at the floor. You know what I'm saying? Because, you know, like I said, it's just -- some things, you know, you -- you can't believe they're being afflicted upon you, or the response that you get from some of the -- you know, the officers that, you know, are escorting you or giving you your food. You know what I'm saying? Like I said, you know, it's not to the point where you want to commit suicide, but sometimes I'm at the point that I'd feel like going right to the judge, say, "Just give me the death penalty. Just give me the death penalty, man."</p> <p>Because you're back here, you're actually down off here, you're trying to keep a front up that you are trying to -- trying to pretend you're happy. You're trying to show a sense of humor, you know. Trying to keep you going, you know."</p>
11	Memory loss	14:46:29- 14:47:03	<p>Q: Are there any other conditions you would like to share with me?</p> <p>"That -- that -- the short-term, long-term memory. You know, I -- I could be sitting in my cell writing and here it is, I've forgotten -- in the paragraph that I'm writing, I'd have forgot what I was writing down. I kind of lost -- you know what I'm saying? I think of the next line, because I done forgot. It's -- it's time we -- you done set your pen down, then you're like, "Where is my ink pen?" You're looking all over your cell, you're tearing your whole cell up, and your ink pen is right in front of you."</p>

12	Memory/vision	14:47:06- 14:47:36	Q: Do you attribute short term/long term memory loss to aging? “No aging, yeah, but I think it was speeded up by being back here. Your vision just distorted.”
13	Paranoia	15:00:46- 15:01:26	Q: You were not experiencing any violent dreams before 8 or 9 years ago here at Pelican Bay? “Not one. Not one violent dream. I didn’t even dream. I didn’t have thoughts of looking up the top of my bunk and you see cracks above you and you think, hey if there is an earthquake, this bunk is going fall on you. I never had those thoughts, that a cop might come in and be mad and do a postal and start shooting up your cell. I never used to have those thoughts. But now its like hey man, is that a possibility?”