

Return Date: No return date scheduled  
Hearing Date: 2/19/2021 10:00 AM - 10:00 AM  
Courtroom Number: 2410  
Location: District 1 Court  
Cook County, IL

2020CH06403

FILED  
10/22/2020 9:44 AM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2020CH06403

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# EXHIBIT

# L

FILED DATE: 10/22/2020 9:44 AM 2020CH06403



**DLA Piper LLP (US)**  
444 West Lake Street  
Suite 900  
Chicago, Illinois 60606-0089  
www.dlapiper.com

Paul Steadman  
Paul.Steadman@dlapiper.com  
T 312.368.2135  
F 312.251.2850

July 15, 2019

**VIA E-MAIL**

Prathima Yeddanapudi, Esq.  
Cook County State's Attorney's Office  
500 Richard J. Daley Center  
Chicago, Illinois 60602  
[prathima.yeddanapudi@cookcountyil.gov](mailto:prathima.yeddanapudi@cookcountyil.gov)

**Re: Chicago Justice Project Request for Information**

Dear Ms. Yeddanapudi:

We wrote to you with regard to our client Chicago Justice Project ("CJP") and its request for updates to information provided in resolution of the litigation captioned *Chicago Justice Project v. Cook County State's Attorney's Office*, Case No. 15 CH 18147 (the "Litigation") on December 5, 2018. Our previous letter is attached for your reference. We have heard no response, and we are running out of options.

We write again to reiterate our request that the CCSAO immediately provide the information set forth in the attached letter, namely, the updated data set with proper formatting. This updated data set, and the proper formatting, were part and parcel of the settlement of the Litigation. CCSAO's ongoing and continued failure to provide the updates and the proper formatting clearly violate both the letter and the spirit of the settlement. Continued ongoing failure to produce the information will force us to revisit the Litigation and/or the settlement.

Additionally, we request that the CCSAO immediately provide the data dictionary necessary to interpret the data. Specifically, it is unclear what information is contained in the following fields in the data CCSAO previously provided:

- Table L\_COURT: COURT\_TYPE\_ID Number
- Table L\_FACILITY: FACILITY\_AREA\_ID Number
- Table T\_PERSON\_ADDL\_INFO: DL\_STATE\_ID Number
- Table T\_PERSON\_ADDL\_INFO: CUSTODY\_STATUS\_ID Number
- Table T\_PERSON\_ADDL\_INFO: GANG\_TYPE\_ID Number
- Table T\_PERSON\_ADDL\_INFO: CITIZENSHIP\_STATUS Number



Prathima Yeddanapudi, Esq.

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- Table T\_PERSON\_ADDL\_INFO: PROPERTY\_LOSS\_TYPE Number
- Table T\_PERSON\_ADDL\_INFO: SKIN\_TYPE\_ID Number
- Table T\_PERSON\_ENTITY\_INFO: ENTITY\_TYPE\_ID Number
- Table L\_OFFICER: TITLE\_ID Number
- Table T\_ADDR: CITY\_ID Number
- Table T\_ADDR: COUNTY\_ID Number
- Table T\_CASE\_PARTICIPANT: CASE\_PARTICIPANT\_ROLE\_ID Number
- Table T\_CASE\_PARTICIPANT: PARTICIPANT\_STATUS ID Number
- Table T\_ARREST\_INFO: ARREST REASON ID Number
- Table T\_ARREST\_INFO: IDENTITY\_METHOD\_ID Number
- Table T\_ARREST\_INFO: INITIAL\_CUSTODY\_STATUS\_ID Number
- Table T\_CASE\_DETAIL: CASE\_DETAIL\_TYPE\_ID Number
- Table T\_CASE\_DETAIL: EVENT RESULT ID Number
- Table T\_CASE: CASE TYPE ID Number
- Table T\_CASE: CASE\_SUBTYPE\_ID Number
- Table T\_CASE: OFFENSE TYPE ID Number
- Table T\_CASE: CASE\_STATUS\_ID Number
- Table T\_CASE: CLOSE REASON ID Number
- Table T\_CASE: CLOSE\_SUB\_REASON ID Number

Without the data dictionary, which must be readily available to CCSAO, it is impossible to understand the data provided, or whether CCSAO has met its obligations under the settlement agreement.

Additionally, attached to this letter as Exhibit A are fields which were identified as “Empty” in the CCSAO’s data our client received. Please confirm that the CCSAO does not use these fields. If they were redacted or deleted for any reason, please confirm what was withheld and why.

Please let us know if you have any additional questions. If not, we ask that you confirm that the CCSAO will run the data set with parameters set forth in our previous letter and answer the questions identified above, as soon as possible. Please provide us with an approximate date when this data will be available. CJP reserves all rights.



Prathima Yeddanapudi, Esq.  
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Thank you in advance for your assistance.

Best regards,

**DLA Piper LLP (US)**

A handwritten signature in black ink that reads 'Paul R. Steadman'.

Paul Steadman  
Partner

**EXHIBIT A**

Table L\_COURT:

DISTRICT\_ID Empty  
SORT\_ORDER Empty

Table L\_FILE\_LOCATION:

SORT\_ORDER Empty  
COMMENT Empty

Table L\_LANG:

COMMENT Empty

Table L\_STATUTE\_CAT\_TYPE:

SORT\_ORDER Empty

Table L\_USER\_LIST:

SORT\_ORDER Empty

Table T\_PERSON\_ADDL\_INFO:

PERSON\_FILE\_NUM Empty  
CII\_NUM Empty  
ST\_POLICE\_NUM Empty  
DOC\_NUM Empty  
PHYSICAL\_FILE\_NUM Empty  
HAIR\_STYLE\_ID Empty

Table L\_OFFICER:

OFFICER\_TYPE\_ID Empty  
OFFICER\_TITLE Empty  
SORT\_ORDER Empty

Table L\_ZIP\_CODE:

SORT\_ORDER Empty

Table T\_ADDR:

ZIP\_CODE\_EXTN Empty

Table T\_EVENT:

EVENT\_RESULT\_ID Empty  
OPPOSING\_ATTORNEY\_ID Empty  
WORK\_GROUP\_ID Empty

Table T\_APPOINTMENT:

DOCUMENT\_BIN\_ID Empty

Table T\_CASE\_PARTICIPANT:

PARTY\_TYPE\_ID Empty

BLOCKED\_JUDGE\_ID Empty ATTORNEY\_BEGIN\_DATE Empty

ATTORNEY\_END\_DATE Empty

SALUTATION Empty

AGE\_AT\_ARREST Empty

LOCATION\_DESC Empty

Table T\_CASE\_EVENT\_JUDGE\_HIST:

OPPOSING\_ATTORNEY\_ID Empty

WORK\_GROUP\_ID Empty

Table T\_CASE\_EVIDENCE\_TEST\_ACTION:

BLOOD\_ALCOHOL Empty

AMOUNT Empty

OTHER\_AGENCY\_ID Empty

Table T\_EVENT\_HIST:

OPPOSING\_ATTORNEY\_ID Empty

WORK\_GROUP\_ID Empty

Table T\_EVENT\_SERVICE:

DATE\_SENT\_FOR\_SERVICE Empty

SERVICE\_DEADLINE\_DATE Empty

SERVED\_DATE Empty

SERVED\_BY Empty

SERVICE\_RESPONSE\_ID Empty

SERVICE\_LOCATION Empty

ACKNOWLEDGEMENT\_RECEIVED\_DATE Empty

UNABLE\_TO\_LOCATE\_REASON Empty

SERVICE\_EXPIRATION\_DATE Empty

NOTE Empty

SUBPOENA\_DOC\_ID Empty

Table T\_INCIDNET\_RMS:

COUNTY\_INCIDENT\_ID Empty

COUNTY\_BOOKING\_NBR Empty

UCR\_NUM Empty

LEA\_ID Empty

CITATION\_NUM Empty

IS\_DELETED Boolean

CRIME\_REPORTED\_DATE Empty

OFFENSE\_TYPE\_ID Empty  
ADDRESS\_LINE\_1 Empty  
ADDRESS\_LINE\_2 Empty  
CITY Empty  
STATE Empty  
COUNTY Empty  
ZIP\_CODE Empty  
LOCATION\_DESC Empty  
INCIDENT\_START\_DATE Empty  
INCIDENT\_END\_DATE Empty  
OFFICER\_NAME Empty  
OFFICER\_AGENCY\_ID Empty  
DOC\_ID Empty  
STATUS Text  
CASE\_EXT\_NUM\_1 Empty  
CASE\_EXT\_NUM\_2 Empty  
CASE\_STATUS\_ID Empty  
CASE\_RECEIVED\_DATE Empty  
CASE\_DETAIL\_TYPE\_ID Empty  
CASE\_DETAIL Empty  
CASE\_COURT\_ID Empty  
ERROR\_DATA Empty

Table T\_RELATED\_CASE:

PRISM\_NUM Empty  
PIN Empty

Table T\_RELEASE\_NOTIFICATION\_QUEUE\_CASE:

IMPORTED\_DATE Empty

Table T\_CASE

MASTER\_CASE\_ID Empty  
MAXIS\_NUM Empty  
RATING\_ID Empty  
COURT\_TYPE\_ID Empty  
FILE\_LOCATION\_EMPLOYEE\_ID Empty  
FILE\_LOCATION\_ID Empty  
BILL\_CODE\_ID Empty  
CASE\_NBR\_SUBSERIES Empty  
DEPT\_CONTACT\_PERSON Empty  
CONTACT\_PERSON\_PHONE Empty  
COURT\_ROOM\_NAME Empty  
PRE\_PETITION\_SCREENING Empty  
RESPONDENT\_LOCATION Empty  
YEAR Empty

CASE\_RE\_LINE Empty  
PHYSICAL\_FILE\_NUM Empty  
RESOLUTION\_NUM Empty  
CONTRACT\_TYPE\_ID Empty  
CONTRACT\_DESC Empty  
CONTRACT\_START\_DATE Empty  
CONTRACT\_END\_DATE Empty  
CONTRACT\_AMOUNT Empty  
CONTRACT\_NUM Empty  
ELECTION\_DATE Empty  
ELECTED\_OFFICE\_ID Empty  
GOV\_UNIT\_ID Empty  
CANDIDATE Empty  
PRISM\_NUM Empty  
INITIATING\_JURISDICTION Empty  
ASSISTANCE\_TYPE\_ID Empty  
CSO Empty  
CSS Empty  
CSS\_FAS\_PHONE Empty  
PATERNITY\_CLERK Empty  
ASSESSOR\_ID Empty  
ASSESSOR\_PHONE Empty  
RESPONSE\_LEA\_ID Empty  
PROJECT\_TITLE Empty  
PROJECT\_NUM Empty  
EXPUNGED\_REASON Empty  
DIVERSION\_PROGRAM\_ID Empty  
DIVERSION\_REASON\_ID Empty  
COMMITMENT\_TYPE Empty  
COMMITMENT\_FACILITY Empty  
CASE\_REFERRAL\_ID Empty  
CLAIM\_NUM Empty  
PARTICIPANTS Empty

Table T\_CASE

MASTER\_CASE\_ID Empty  
MAXIS\_NUM Empty  
RATING\_ID Empty  
COURT\_TYPE\_ID Empty  
FILE\_LOCATION\_EMPLOYEE\_ID Empty  
FILE\_LOCATION\_ID Empty  
BILL\_CODE\_ID Empty  
CASE\_NBR\_SUBSERIES Empty  
DEPT\_CONTACT\_PERSON Empty  
CONTACT\_PERSON\_PHONE Empty



COURT\_ROOM\_NAME Empty  
PRE\_PETITION\_SCREENERS Empty  
RESPONDENT\_LOCATION Empty  
YEAR Empty  
CASE\_RE\_LINE Empty  
PHYSICAL\_FILE\_NUM Empty  
RESOLUTION\_NUM Empty  
CONTRACT\_TYPE\_ID Empty  
CONTRACT\_DESC Empty  
CONTRACT\_START\_DATE Empty  
CONTRACT\_END\_DATE Empty  
CONTRACT\_AMOUNT Empty  
CONTRACT\_NUM Empty  
ELECTION\_DATE Empty  
ELECTED\_OFFICE\_ID Empty  
GOV\_UNIT\_ID Empty  
CANDIDATE Empty  
PRISM\_NUM Empty  
INITIATING\_JURISDICTION Empty  
ASSISTANCE\_TYPE\_ID Empty  
CSO Empty  
CSS Empty  
CSS\_FAS\_PHONE Empty  
PATERNITY\_CLERK Empty  
ASSESSOR\_ID Empty  
ASSESSOR\_PHONE Empty  
RESPONSE\_LEA\_ID Empty  
PROJECT\_TITLE Empty  
PROJECT\_NUM Empty  
EXPUNGED\_REASON Empty  
DIVERSION\_PROGRAM\_ID Empty  
DIVERSION\_REASON\_ID Empty  
COMMITMENT\_TYPE Empty  
COMMITMENT\_FACILITY Empty  
CASE\_REFERRAL\_ID Empty  
CLAIM\_NUM Empty  
PARTICIPANTS Empty