

EXHIBIT 4

EXHIBIT 2

From: [Jim Depriest](#)
To: [Cassandra Stubbs](#)
Subject: RE: Record request for Ledell Lee
Date: Friday, April 14, 2017 6:03:02 PM

Yes, the files we produced were relatively recent covering current medical conditions and care. Most of the inmates scheduled for execution have been here for 25 years or more. That volume of records would be very difficult to produce, perhaps even locate, on a short deadline. I'm not sure I have a solution to offer. It took our staff a considerable amount of time to put together what was produced.

James DePriest
Chief Legal Counsel
Central Office, Legal Division
Arkansas Department of Correction
Office- 870-267-6371
Cell – 870-550-5225
Jim.depriest@arkansas.gov

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-----Original Message-----

From: Cassandra Stubbs [<mailto:cstubbs@aclu.org>]
Sent: Friday, April 14, 2017 10:51 AM
To: Jim Depriest <Jim.Depriest@arkansas.gov>
Subject: RE: Record request for Ledell Lee

I will check with the Federal Defenders' office, but the files that I have from Mr. Short's file are only recent records and do not cover his full period of incarceration. I have no idea what years the Federal Defenders requested.

-----Original Message-----

From: Jim Depriest [<mailto:Jim.Depriest@arkansas.gov>]
Sent: Friday, April 14, 2017 11:44 AM
To: Cassandra Stubbs
Subject: RE: Record request for Ledell Lee

Those should be available through counsel for the inmate and the federal public defender's office. We produced medical and mental health records some weeks ago. It is possible that Mr. Short may not have been aware of this.

About a week ago I checked with John Williams of the federal public defender's office and he confirmed that they had everything sought to date on each of the inmates. You may wish to check with him.

The medical records of these inmates were, given the years they have been incarcerated, quite extensive. We produced all that were deemed relevant to each inmate's current condition, and even that was several thousand pages in total. We did not keep a separate copy. These were produced to the AG's office who shared them with the federal public defender. We are really not in a position to recreate that file on short notice. If the federal public defender does not have Mr. Lee's medical files, I can authorize the AG's office to share those with Mr. Short and he can share them with you.

On the mental health side, I am sure we provided those to the federal public defender.

James DePriest
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-----Original Message-----

From: Cassandra Stubbs [<mailto:cstubbs@aclu.org>]
Sent: Friday, April 14, 2017 10:21 AM
To: Jim Depriest <Jim.Depriest@arkansas.gov>
Cc: ADC Inmate Info <adc.inmate.info@arkansas.gov>; liz.vartkessian@gmail.com; leedshort@gmail.com
Subject: RE: Record request for Ledell Lee

Dear Mr. DePriest,

I wanted to follow up to see if the records are available. We in particular require any medical and mental health records as soon as possible.

Thank you,
Cassy Stubbs

-----Original Message-----

From: Solomon Graves [<mailto:Solomon.Graves@arkansas.gov>]
Sent: Tuesday, April 11, 2017 9:16 PM
To: liz.vartkessian@gmail.com; Cassandra Stubbs; leedshort@gmail.com; ADC Inmate Info
Cc: Jim Depriest
Subject: Fwd: Record request for Ledell Lee

Ms. Stubbs,

By copy, I am referring you to ADC Assistant Director and Chief Legal Counsel Jim DePriest. He will assist you in this matter. Please do not hesitate to contact me with anything further.

Solomon Graves
Public Information Officer & Legislative Liaison Arkansas Department of Correction
Office: 870-267-6205
Cell: 870-643-1922
Fax: 870-267-6244
Solomon.Graves@arkansas.gov <<mailto:Solomon.Graves@arkansas.gov>>
<http://ADC.arkansas.gov>

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Sent from my iPhone

Begin forwarded message:

From: Cassandra Stubbs <cstubbs@aclu.org<<mailto:cstubbs@aclu.org>>>
Date: April 11, 2017 at 8:11:47 PM CDT
To: adc.inmate.info@arkansas.gov<<mailto:adc.inmate.info@arkansas.gov>>
<adc.inmate.info@arkansas.gov<<mailto:adc.inmate.info@arkansas.gov>>>,&br/>solomon.graves@arkansas.gov<<mailto:solomon.graves@arkansas.gov>>
<solomon.graves@arkansas.gov<<mailto:solomon.graves@arkansas.gov>>>
Cc: Liz Vartkessian <liz.vartkessian@gmail.com<<mailto:liz.vartkessian@gmail.com>>>,
leedshort@gmail.com<<mailto:leedshort@gmail.com>>
<leedshort@gmail.com<<mailto:leedshort@gmail.com>>>
Subject: Record request for Ledell Lee

Dear Mr. Solomon,

Attached please find a record request letter and signed release for Ledell Lee's records. Please let me know if you have any questions.

Thank you,
Cassy

Cassandra Stubbs
Director
ACLU Capital Punishment Project
201 W. Main St. Suite 402, Durham NC 27701
(919) 688-4605 (direct dial)

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