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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 CATHY WOODS (a/k/a ANITA CARTER),)
by and through her Personal Representative,)
14 LINDA WADE,) Case No.: 3:16-cv-00494
)
15 Plaintiff,)
v.) **Complaint and Jury Demand**
16)
CITY OF RENO, NEVADA, LAWRENCE C.)
17 DENNISON, DONALD W. ASHLEY,)
CLARENCE A. "JACKIE" LEWIS, CALVIN)
18 R. X. DUNLAP, WASHOE COUNTY,)
NEVADA, DOUGLAS MATTHEW BURKS,)
19 M.D., JOHN L. KIMPTON,)
)
20 Defendants.)

21
22 Now comes Plaintiff, CATHY WOODS (a/k/a ANITA CARTER), by and through her
23 Personal Representative, LINDA WADE, and complains of Defendants CITY OF RENO,
24

1 NEVADA, former Reno Police Lieutenant LAWRENCE C. DENNISON, former Reno Police
2 Detective JOHN L. KIMPTON, former Shreveport Police Detective DONALD W. ASHLEY,
3 former Shreveport Police Detective CLARENCE A. “JACKIE” LEWIS, former Washoe County
4 District Attorney CALVIN R. X. DUNLAP, WASHOE COUNTY, NEVADA, and DOUGLAS
5 MATTHEW BURKS, M.D., as follows:

6 **Introduction**

7 1. Plaintiff, Cathy Woods, also known as Anita Carter, was wrongfully convicted for
8 the 1976 murder of Michelle Mitchell—a crime she did not commit. Arrested in 1979, Plaintiff
9 served over 35 years of a life sentence before she was exonerated in September 2014. She is one
10 of the longest-serving wrongfully convicted persons to be exonerated in United States history.
11 Ms. Woods is also the longest-serving wrongfully convicted woman to be exonerated in United
12 States history.

13 2. Ms. Woods was exonerated after DNA testing conducted on evidence from the
14 crime scene revealed that the actual killer was a serial rapist and murderer, a man named Rodney
15 Halbower. Halbower is currently serving a prison sentence in Oregon.

16 3. Facing the pressure of solving a high-profile cold case they had previously (and
17 rightly) investigated as a crime perpetrated by a man, who they also believed was a serial killer,
18 Defendants decided to contradict their years of prior investigation and turn to misconduct in
19 order to “solve” the case.

20 4. Specifically, Defendants decided to pursue Ms. Woods—a woman who was
21 diagnosed with paranoid schizophrenia and involuntarily committed in a state mental hospital—
22 as a suspect. In so doing, the Defendants coerced and fabricated statements attributed to Ms.
23 Woods they knew to be false and involuntary. Egregiously, the Defendants preyed on Ms.
24

1 Woods because she was mentally vulnerable and also due to their own homophobia, as they
2 believed she was a lesbian.

3 5. In sum, Defendants' misconduct included but was not limited to the coercion and
4 fabrication of Ms. Woods' false confession, and the fabrication of additional false evidence
5 against Ms. Woods, as well as the suppression of exculpatory evidence.

6 6. Ms. Woods will never get 35 years of her life back, and nothing about being
7 mentally vulnerable could ever justify being wrongfully convicted for over three decades. Ms.
8 Woods therefore brings this action, pursuant to 42 U.S.C. § 1983 and Nevada law, seeking
9 redress for the wrongs done to her, as well as to deter future misconduct.

10 **Jurisdiction and Venue**

11 7. This Court has jurisdiction over Plaintiff's federal claims pursuant to 28 U.S.C. §
12 1331, because she asserts claims for violations of her constitutional rights, including under the
13 Fourth, Fifth, and Fourteenth Amendments, as described in more detail below. This Court has
14 jurisdiction over her state-law claims pursuant to 28 U.S.C. § 1367.

15 8. Venue is proper because, upon information and belief, most of the individual
16 defendants reside within this district, and events giving rise to the claims asserted herein
17 occurred within this district.

18 **Parties**

19 9. Plaintiff Cathy Woods, also known as Anita Carter, is a 66 year-old resident of
20 Washington State. Ms. Woods' real name is Anita Carter, but she was prosecuted and convicted
21 in Nevada under the name Cathy Woods. Due to her mental illness and incompetency, which
22 was worsened by her decades of imprisonment, Ms. Woods is cared for by Linda Wade, who has
23
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1 full guardianship of Ms. Woods' person and estate. When Ms. Woods was arrested in 1979, she
2 was 29 years-old and living in Shreveport, Louisiana.

3 10. Defendant Lawrence C. Dennison was at all times relevant to this Complaint a
4 lieutenant with the Reno Police Department in Reno, Nevada. At all times relevant, Defendant
5 Dennison acted under color of law and within the scope of his employment for the Defendant
6 City of Reno and the Reno Police Department. He is sued in his individual capacity.

7 11. Defendant John L. Kimpton was at all times relevant to this Complaint a detective
8 with the Reno Police Department in Reno, Nevada. At all times relevant, Defendant Kimpton
9 acted under color of law and within the scope of his employment for the Defendant City of Reno
10 and the Reno Police Department. He is sued in his individual capacity.

11 12. Defendant Donald W. Ashley was at all times relevant to this Complaint a
12 detective with the Shreveport Police Department in Shreveport, Louisiana. At all times relevant,
13 Defendant Ashley acted under color of law and within the scope of his employment. He is sued
14 in his individual capacity.

15 13. Defendant Clarence A. "Jackie" Lewis was at all times relevant to this Complaint
16 a detective with the Shreveport Police Department in Shreveport, Louisiana. At all times
17 relevant, Defendant Lewis acted under color of law and within the scope of his employment. He
18 is sued in his individual capacity.

19 14. Defendants Dennison, Kimpton, Ashley, and Lewis are referred to herein as the
20 "Defendant Officers." At least one of the Defendant Officers was, at all times relevant, a final
21 policymaker or had been delegated such authority, for the Defendant City.

22 15. Defendant City of Reno (the "City") is a Nevada municipal corporation that
23 operates the Reno Police Department (the "Department"). The City is liable for all torts
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1 committed by the Defendant Officers while employed by the City pursuant to the doctrine of
2 *respondeat superior*. The City is additionally responsible for the policies and practices of the
3 City and Department.

4 16. Defendant Calvin R. X. Dunlap was at all times relevant to this Complaint the
5 District Attorney of Washoe County, Nevada. At all times relevant, Defendant Dunlap acted
6 under color of law and within the scope of his employment for Washoe County and the Washoe
7 County District Attorney's Office. Defendant Dunlap is being sued in his individual and official
8 capacities, and for actions taken in an investigative capacity alone. As District Attorney of
9 Washoe County, Defendant Dunlap was the final policymaker for the Washoe County District
10 Attorney's Office, and for Washoe County, Nevada with respect to criminal prosecutions.

11 17. Defendant Washoe County (the "County") is a political subdivision that operates
12 the Washoe County District Attorney's Office. The County is liable for all torts committed by
13 Defendant Dunlap while employed by the County pursuant to the doctrine of *respondeat*
14 *superior*. The County is additionally responsible for the policies and practices of the Washoe
15 County District Attorney's Office.

16 18. Defendant Douglas Matthew Burks, M.D., is a physician. Defendant Burks was at
17 all times relevant to this Complaint an employee at the Louisiana State University ("LSU")
18 Medical Center in Shreveport, Louisiana. At all times relevant, Defendant Burks acted under
19 color of law and within the scope of his employment for the LSU Medical Center, a public
20 hospital. He is sued in his individual capacity.

21 19. Defendants Dennison, Kimpton, Ashley, Lewis, and Dunlap are collectively
22 referred to as the "Law Enforcement Defendants." All of the Defendants are collectively referred
23 to as "Defendants."

Factual Background

20. Cathy Woods was born in Georgia. During her childhood, she lived in several different states because her father was in the military. Ms. Woods had a difficult childhood. She received only a sixth-grade education, could barely read, and had a below-average IQ.

21. Ms. Woods has a lifelong history of severe mental illness. She was diagnosed with and hospitalized for schizophrenia at the age of 12. By the time she was in her 20s, she had been hospitalized numerous times for psychiatric treatment. She also has a family history of mental illness.

22. At the same time, Ms. Woods was able to live a happy and productive life. She was able to live independently, work to support herself, and form relationships with others.

23. In about 1969, Ms. Woods moved to Reno, Nevada, where she lived and worked until 1977. In February 1976, Ms. Woods was working as a bartender and manager of a bar in Reno. Ms. Woods was living and working on her own, and her schizophrenia, while ever present, was under control. Ms. Woods lived in Reno until 1977, when she moved back to Shreveport, Louisiana, where her family was living.

The Murder of Michelle Mitchell

24. On the evening of February 24, 1976, Michelle Mitchell, a 19 year-old University of Nevada, Reno, student, was murdered.

25. Cathy Woods did not murder Michelle Mitchell. She had nothing to do with this crime whatsoever and is completely innocent.

26. Michelle's body was found in a detached garage at a house on Evans Avenue near the University campus. Her hands were tied and her throat had been slashed.

1 27. There was a cigarette butt that had been found near her body at the scene. The
2 murder weapon was never found.

3 28. There were two sets of footprints on the dirt floor of the garage: Michelle's and
4 the killer's.

5 29. The killer's shoeprints reflected a male shoe, approximately size 9 or 9.5 men's
6 shoe.

7 30. At that size, the killer's male shoeprint was more than two shoe sizes larger than
8 Ms. Woods' smaller, feminine shoe size.

9 31. Michelle had gone missing a few hours earlier after her car broke down near the
10 University campus. She used a pay phone near the Agricultural Building of the University to call
11 her mother to come pick her up. She then walked back to her car to wait. When her mother
12 arrived, Michelle was not there.

13 32. Michelle's abduction and murder was extensively reported in the news. There
14 were numerous contemporaneous, published reports containing information that was known
15 about the circumstances of the crime, including the kind of car Michelle was driving, where she
16 was found, and how she was found.

17 33. For instance, it was publicly reported that: Michelle's car broke down across from
18 the University Agricultural Building; her car was a Volkswagen bug; her body was discovered in
19 a garage nearby; her throat had been slashed; she was 19 years-old; her hands had been tied
20 behind her; and she was fully clothed and there was no evidence of sexual assault or molestation.
21 Michelle's picture was also published, showing her to have long, blond hair.

22 34. Ms. Woods had seen the news coverage of Michelle Mitchell's murder, as had
23 many other residents of Reno.

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1 35. In the days immediately after Michelle’s death, numerous witnesses who were on
2 or near campus on the night of the murder came forward to the police with information.

3 36. Some witnesses reported information about the abduction itself. For instance, two
4 witnesses told the police that, as Michelle walked back to her car after making a phone call, they
5 saw a man come out from in or near her car and put his arms around her, startling her. They
6 described him as taller than Michelle, who was approximately 5’11” tall.

7 37. Several of these witnesses reported seeing a suspicious man running away from
8 the scene of the crime at around the time that the crime was believed to have occurred. For
9 instance, a number of fraternity brothers at the Sigma Alpha Epsilon (“SAE”) fraternity house
10 near Evans Avenue and 9th Street also told the police that they saw a man walking hurriedly
11 away from Evans Avenue.

12 38. Another witness who was driving near the SAE house told police investigators
13 she almost hit a man who ran in front of her car away from the scene of the crime. This witness
14 told the police that this man appeared to have blood on him and had one hand held oddly under
15 his jacket or held to his side as he ran.

16 39. In sum, the witnesses uniformly described the suspect as a man with medium to
17 heavy build, longish dirty hair, approximately six feet tall, and wearing a jacket.

18 40. Based on this and other information, the police believed that the suspect in
19 Michelle’s murder was a single man.

20 41. In fact, the police believed that Michelle’s killer was probably a male serial killer,
21 given similar killings of young women in the region.

22 42. Accordingly, on the basis of the foregoing, the Reno Police Department put out
23 composite sketches seeking information about the crime seeking tips from community members.
24

1 And, owing to the highly public nature of Michelle's abduction and murder, the Department
2 received scores of responses.

3 43. In addition, investigators worked with other law enforcement agencies to identify
4 possible connections to other cases, all the while looking for a single, male serial criminal. In so
5 doing, detectives coordinated with other law enforcement agencies in the Northern California
6 and Pacific Northwest region, and sent their composite sketch to a number of other agencies.

7 44. Despite these steps and a number of community-suggested leads, the police
8 investigation did not result in any arrests. The high-profile case went cold.

9 **Cathy Woods' Involuntary Commitment at LSU Medical Center in February 1979**

10 45. Ms. Woods left Reno about a year after Michelle's murder, and she moved to
11 Shreveport, Louisiana to be near her family. There, her mental condition deteriorated.

12 46. As a result, Ms. Woods had to be hospitalized for psychiatric treatment. She was
13 involuntarily committed at Central Louisiana State Hospital from approximately October 1978
14 through December 1978.

15 47. Just two months later, in February 1979, Ms. Woods was involuntarily committed
16 again, at the LSU Medical Center in Shreveport, Louisiana. This was the second time in six
17 months that she needed to be hospitalized against her will in order to receive treatment for her
18 severe mental illness. At the time, Ms. Woods was suffering profoundly from her mental illness
19 and was an easily confused and extremely vulnerable woman.

20 48. While at LSU Medical Center, Ms. Woods was treated for chronic schizophrenia.
21 In addition, Ms. Woods suffered from thought disorder, meaning that her thinking was not
22 logical or coherent, and she had auditory hallucinations, meaning that she heard voices in her
23 head that were not real.

1 49. Ms. Woods was classified by physicians as “extremely psychotic,” and her
2 thought disorder manifested itself outwardly in an obvious way. She was very ill.

3 50. Indeed, in the days leading up to March 6-8, 1979, and despite receiving
4 medication, her condition grew worse than it was at the time of her admission.

5 51. While at LSU Medical Center, Ms. Woods asked repeatedly when she could go
6 home. She was told that she could not go home, and she was not allowed to go home.

7 **Ms. Woods Speaks to an Institutional Counselor**

8 52. On or about March 6, 1979, while she was floridly psychotic and hearing voices,
9 Ms. Woods told a counselor at LSU Medical Center, Carol Sherman, about a girl named
10 Michelle being murdered in Reno several years earlier.

11 53. Ms. Woods’ statement to Sherman was vague, and she did not tell Sherman
12 anything about the crime that had not been publicly reported.

13 54. Nonetheless, and unlawfully, Sherman called Defendant Donald W. Ashley, a
14 Shreveport detective.

15 55. Even though Ms. Woods’ statement bore no indicia of reliability and was false,
16 Defendant Ashley, in turn, called the Reno Police Department and spoke with other Defendant
17 Officers about the Mitchell homicide.

18 **The Defendants Were Eager to Solve a Cold Case**

19 56. The Defendant Officers conferred with Defendant Dunlap, who was the District
20 Attorney of Washoe County at the time, about what their next investigative steps should be with
21 respect to this information from Defendant Ashley. Defendant Dunlap provided advice and
22 direction to the other Defendants about how to conduct their investigation.
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1 57. Not only were there no reasonable grounds to believe that Ms. Woods was
2 actually involved in Michelle Mitchell's death, but her physical appearance at the time of the
3 crime and at the time of her involuntary commitment bore no resemblance to the description of
4 the male suspect provided by witnesses. For instance, Ms. Woods was several inches shorter than
5 the suspect and had a womanly figure. The idea that Ms. Woods was the killer was contrary to all
6 evidence the Defendants had.

7 58. Nevertheless, the Law Enforcement Defendants decided that the Defendants from
8 Reno should travel to Shreveport, Louisiana to interrogate Ms. Woods.

9 59. At the time of the interrogations, the Law Enforcement Defendants were eager to
10 solve a highly-publicized murder case that had become a cold case.

11 60. Though completely unreliable, the information the Law Enforcement Defendants
12 had received about Ms. Woods' alleged statement to Carol Sherman was the first lead they had
13 had in years.

14 61. Given the sensational nature of the crime, the Law Enforcement Defendants were
15 under pressure to solve the case. There existed a belief among each of the Defendants that
16 getting Ms. Woods to confess was the surest way to obtain a speedy resolution.

17 **The Defendants Interrogate Ms. Woods on Multiple Occasions over Two Days**

18 62. In more than one session over the course of two days, on March 7 and 8, 1979, the
19 Law Enforcement Defendants interrogated Ms. Woods while Defendant Burks and possibly
20 others were present.

21 63. Before Ms. Woods confessed, the Law Enforcement Defendants consulted with
22 one another about the interrogations and how they would be conducted.

1 64. Defendant Dunlap supervised the interrogations, provided advice, and coordinated
2 with the other Defendants on the manner in which the interrogations would be conducted.

3 65. Defendant Burks allowed Ms. Woods to be interrogated by the police even though
4 he knew she was seriously mentally ill and manifesting outward signs of her mental illness.

5 66. On March 7 and 8, 1979, the Defendants interrogated Ms. Woods in a room at the
6 LSU Medical Center, where she was being involuntarily held.

7 67. Ms. Woods was not free to leave the room during the interrogations.

8 68. Nor was Ms. Woods free to leave the hospital during the interrogations.

9 69. At no time during the interrogations did the Defendants tell Ms. Woods that she
10 was free to leave.

11 70. Ms. Woods knew that she was not free to leave.

12 71. In the days leading up to the interrogations by the Defendants, Ms. Woods had not
13 responded to her psychiatric medication and, in fact, her condition had deteriorated to worse than
14 it was when she was first committed.

15 72. At the time of the interrogations, the Defendants knew that Ms. Woods was so
16 mentally ill that, among other things, she was involuntarily committed to the LSU Medical
17 Center by order of a court; she had been diagnosed as schizophrenic; she was suffering from
18 psychosis; she was hearing voices; she had a history of schizophrenia; and she had been in and
19 out of hospitals for psychiatric treatment in the months before her commitment at LSU Medical
20 Center in February 1979.

21 73. At the time of the interrogations, Ms. Woods was suffering from her mental
22 illness, which interfered with her ability to function properly. She was experiencing disorganized
23 thoughts, an inability to think in a linear or logical fashion, and auditory hallucinations. Ms.
24

1 Woods was having difficulty communicating in a logical and linear fashion due to her then-
2 existing mental condition.

3 74. As a result of Ms. Woods' inability to communicate in a normal manner, as well
4 as her below-average intelligence and limited education, it was immediately obvious to any
5 person who questioned Ms. Woods at any point on March 6, 7, or 8, 1979, that she was suffering
6 from cognitive deficiencies and symptoms of mental illness, and that she had little to no
7 education or understanding of the situation.

8 75. Neither before nor during the first interrogation on March 7, 1979, did anyone,
9 including any of the Defendants, inform Ms. Woods of her constitutional rights pursuant to
10 *Miranda v. Arizona*, 384 U.S. 486 (1966).

11 76. When she was being questioned, Ms. Woods indicated that she did not have any
12 personal knowledge about the Michelle Mitchell murder.

13 77. The Defendants secured what they knew to be a false and involuntary confession
14 from Ms. Woods by, among other things: (a) asking leading questions that supplied Ms. Woods
15 with non-public information about the crime; (b) asking her the same questions repeatedly even
16 when she was unable to answer; (c) telling her to guess the answers to questions when she did
17 not know the answers; (d) correcting her complete guesses to match the facts of the crime; (e)
18 pressuring her, while supplying correct information in an effort to get her to change her answers
19 to their questions; and (f) otherwise feeding her information about the crime so that the
20 "confession" she involuntarily gave would appear consistent and reliable. Ms. Woods knew that
21 the Law Enforcement Defendants were police officers or officers of the law. They wore guns
22 during the interrogations, contributing to the coercive nature of their questioning.

1 78. The presence of Defendant Burks in the room during one of the interrogations
2 also contributed to the coercive circumstances, since hospital staff was often used to help control
3 patients. Despite Ms. Woods' inability to provide knowing and voluntary statements, Defendnat
4 Burks did nothing to intervene and stop the interrogation.

5 79. During the interrogations, the Defendants observed Ms. Woods' obvious
6 cognitive deficiencies and symptoms of mental illness. Rather than take steps to ensure that Ms.
7 Woods was truly and freely agreeing to confess, these Defendants took advantage of her
8 diminished capacity and mental vulnerabilities and continued their interrogations in a manner
9 intended to force Ms. Woods to falsely confess.

10 80. Defendants overcame Ms. Woods' will through improper means, and thereby
11 succeeded in getting her to provide a false, involuntary confession to the murder of Michelle
12 Mitchell.

13 81. In the totality of the circumstances, and in particularly in light of Ms. Woods'
14 mental and physical status (being involuntarily committed at a state psychiatric hospital),
15 Defendants' conduct during the interrogations was coercive.

16 82. Prior to Ms. Woods' "confession" to the Defendants, there was no probable cause
17 to believe that she had committed any crime.

18 83. After Ms. Woods' "confession" to the Defendants, there was no probable cause to
19 believe that she had committed any crime.

20 84. At no time was there probable cause to believe that Ms. Woods had participated
21 in the murder of Michelle Mitchell in any way whatsoever.

22 85. Ms. Woods' false confession during her interrogations was not memorialized or
23 written down in any way.

24

1 86. It was not audio recorded, even though the Defendants had the capacity to record
2 statements.

3 87. Nor did the Defendants ask Ms. Woods to write her confession down.

4 88. Nor did they contemporaneously write the confession down for her and ask her to
5 review or sign it.

6 89. Instead, in fabricating false evidence, the Defendants later memorialized Ms.
7 Woods' purported confession.

8 90. In so doing, in addition to details that either had been publicly reported in the
9 news, Defendants added non-public facts about the crime to make it appear as if the false
10 confession were reliable.

11 91. Ms. Woods had no personal knowledge of the facts and circumstances
12 surrounding the murder contained in her confession. Instead, Ms. Woods recalled only vague
13 information about the crime that had been publicly reported.

14 92. Being totally innocent, and having no knowledge of the crime, Ms. Woods could
15 not have provided the information contained in her confession without the Defendants having
16 provided the non-public facts to her during the course of her interrogations, or having recalled
17 specific public information that had been reported in the news.

18 93. The Defendants were subjectively aware that Ms. Woods had no personal
19 knowledge about the murder. As described above, they suggested answers and fed her
20 information about the crime in order to bolster her "confession."

21 94. The Defendants also focused on what they thought was Ms. Woods'
22 homosexuality, claiming that Ms. Woods told them that she killed Michelle Mitchell because
23 Michelle had rejected a sexual advance by Ms. Woods.

Additional Misconduct

1
2 95. Between her interrogations on March 7 and 8, 1979, Ms. Woods told one of her
3 physicians, Dr. Linda Boswell, that she wanted to have an attorney.

4 96. Dr. Boswell informed one or more of the Law Enforcement Defendants that Ms.
5 Woods had asked for an attorney.

6 97. The Law Enforcement Defendants knew that Ms. Woods had invoked her right to
7 an attorney and that she did not wish to speak with them.

8 98. The Law Enforcement Defendants agreed that they would question her again,
9 despite the fact that she had invoked her right to an attorney and to remain silent, and even
10 though they were aware of her mental illness and cognitive deficiencies. They also promised that
11 things would go “quicker” and easier if she did not have an attorney.

12 99. In addition, on or about March 8, 1979, the Law Enforcement Defendants decided
13 to search Ms. Woods’ mother’s house, where she was living prior to being involuntarily
14 committed. Despite the fact that it was years after the crime, and the fact that they were looking
15 for a common household item, they told Ms. Woods and her family members they were looking
16 for a murder weapon, which they believed was a knife.

17 100. The Law Enforcement Defendants brought Ms. Woods to her house for the
18 search. Ms. Woods was in Defendants’ custody the entire time. She was not allowed to leave,
19 and she was handcuffed.

20 101. During the search, the Law Enforcement Defendants interrogated Ms. Woods yet
21 again, despite being aware of her mental vulnerabilities and prior invocation of her right to an
22 attorney, as described above. The Defendants overcame Ms. Woods’ will through improper
23 means and thereby succeeded in getting her to provide additional false, incriminating statements.

1 102. The search of Ms. Woods' mother's house in Shreveport, Louisiana did not reveal
2 any piece of evidence linking Ms. Woods to the crime, including any knife related to the crime

3 **Ms. Woods Is Charged With The Murder of Michelle Mitchell**

4 103. Ms. Woods was extradited to Nevada in order to face criminal charges for the
5 murder of Michelle Mitchell.

6 104. The only evidence that led to the institution of criminal proceedings against Ms.
7 Woods was her false confession and involuntary statements obtained by the Defendants in March
8 1979.

9 105. Ms. Woods was detained continuously from her arrest in March 1979 until her
10 conviction was vacated in September 2014.

11 **Ms. Woods' Trial and Wrongful Conviction**

12 106. In 1980, Ms. Woods was tried for Michelle Mitchell's murder.

13 107. At trial, the State's theory was that Ms. Woods committed the crime alone and
14 that she did so out of rage because Michelle had rejected a sexual advance by Ms. Woods. Ms.
15 Woods was also painted as a "sexual deviant" by the Law Enforcement Defendants, because they
16 believed that she was a homosexual and they believed that labeling Ms. Woods a homosexual
17 would aid their efforts to secure her conviction.

18 108. Ms. Woods' attorneys presented extensive evidence on her behalf, including
19 testimony from witnesses who described seeing a man flee from the scene, and testimony that
20 Ms. Woods' physical appearance was markedly different from the witnesses' description of the
21 male suspect.

22 109. As concerns the physical evidence presented at trial, none of it linked to Ms.
23 Woods and there was no physical evidence tying Ms. Woods to the crime whatsoever.

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1 110. Concerning the killer's much larger shoeprint, as one of Ms. Woods' attorneys
2 later remarked, "Why would she wear clown shoes to a murder?"

3 111. Despite this evidence, Ms. Woods was convicted on the basis of her false,
4 involuntary, and fabricated statements.

5 112. She was sentenced to life without the possibility of parole.

6 113. Ms. Woods' conviction was reversed on direct appeal.

7 114. Ms. Woods was tried a second time. Again, no physical evidence linked her to the
8 crime. Nonetheless, in 1985, Ms. Woods was again wrongfully convicted on the basis of her
9 false confession and involuntary statements and sentenced to life without the possibility of
10 parole.

11 115. Defendant Dunlap was not the trial prosecutor at Ms. Woods' second trial and
12 served no prosecutorial function at that trial.

13 **The Crimes of Rodney Halbower**

14 116. In November of 1975, Rodney Halbower attempted to murder a woman in Reno.
15 He was arrested, but was released on bail in December 1975 for a period of several months.

16 117. While he was out on bail, Halbower committed numerous known and unknown
17 crimes in the northern California and Nevada area, and possibly other states, including several
18 killings of young women.

19 118. In February 1976, Halbower murdered Michelle Mitchell despite the fact he was
20 awaiting trial for murdering another innocent woman.

21 119. Halbower's physical appearance in February 1976 was similar to that given by
22 contemporaneous witnesses in Michelle Mitchell's case.

1 120. Halbower was eventually convicted of the attempted murder, but he escaped from
2 prison in Nevada and fled to Oregon in 1986.

3 121. Once in Oregon, Halbower stabbed yet another woman in a parking lot, and he
4 was subsequently convicted of attempted murder, assault, and robbery.

5 122. When he was arrested for the Oregon attempted murder, Halbower was extradited
6 to Nevada to complete his sentence on the 1975 case.

7 123. In the summer of 2014, once he had served his time on the 1975 case, Halbower
8 was returned to the Oregon Department of Corrections to begin serving his life sentence for the
9 1986 attack.

10 124. Halbower is currently incarcerated in Oregon and has been linked through DNA
11 evidence to the murders of three other young women in Northern California that occurred around
12 the same time as Michelle Mitchell's murder.

13 **Ms. Woods' Exoneration**

14 125. In 2013, DNA testing was conducted on evidence from the Michelle Mitchell
15 crime scene, including a cigarette butt found next to Michelle's body. The testing revealed that
16 the DNA did not come from Ms. Woods and instead revealed a single male profile.

17 126. In 2014, after he was required to provide DNA during his transfer from Nevada to
18 the State of Oregon, it became known that the DNA from the crime scene matched Halbower.

19 127. Following the DNA "hit" to Halbower—a serial criminal who has committed an
20 unknown number of crimes against women—Ms. Woods' conviction was vacated on September
21 10, 2014.

1 128. Even then, though released from prison, Ms. Woods' liberty was restrained due to
2 conditions of bond and charges remained pending against Ms. Woods for an additional six
3 months.

4 129. In March 2015, the charges against Ms. Woods were dismissed at the request of
5 the State.

6 130. In so doing, the State publicly declared that the charges were being dismissed due
7 to the fact that Ms. Woods was innocent. Representatives of the State of Nevada further publicly
8 declared that Ms. Woods was innocent and that she did not commit the crime.

9 **Ms. Woods' Injuries**

10 131. Ms. Woods lost over three decades of her life before she was finally exonerated.
11 She was deprived of almost her entire adult life. Imprisoned at age 29 and released at age 64, Ms.
12 Woods must now attempt to make a life for herself outside of prison without the benefit of the
13 decades of life experience which ordinarily equip adults for that task.

14 132. Additionally, the emotional pain and suffering caused by losing 35 years in the
15 prime of life has been enormous. During her wrongful incarceration, Ms. Woods was stripped of
16 the various pleasures of basic human experience, from the simplest to the most important, which
17 all free people enjoy as a matter of right. She missed out on the ability to share holidays, births,
18 funerals, and other life events with loved ones, the opportunity to fall in love and marry, and the
19 fundamental freedom to live one's life as an autonomous human being.

20 133. Ms. Woods also suffered particularly due to her mental illness. For instance, she
21 tried to kill herself in prison, tried to set herself on fire, and was subjected to electroshock
22 therapy. Ms. Woods also suffered physically and was assaulted during her incarceration.

1 134. As a result of the foregoing, Ms. Woods has suffered tremendous damage,
2 including physical sickness and injury and emotional damages, all proximately caused by
3 Defendants' misconduct.

4 **Count I: 42 U.S.C. § 1983 – Fifth and Fourteenth Amendments**

5 **Involuntary Confession**

6 135. Each preceding paragraph of this Complaint is incorporated as if restated fully
7 herein.

8 136. In the manner described more fully above, the Defendants, acting as investigators,
9 individually, jointly, and in conspiracy with one another, forced Plaintiff to incriminate herself
10 falsely and against her will, in violation of her rights secured by the Fifth and Fourteenth
11 Amendments.

12 137. The false, involuntary confession and statements obtained by the Defendants and
13 attributed to Plaintiff were used against Plaintiff to her detriment in her criminal case.

14 138. In addition, Plaintiff's interrogations were custodial in nature. Prior to Plaintiff's
15 interrogations, Defendants did not provide her with any of the warnings required by the Supreme
16 Court in *Miranda v. Arizona*, 384 U.S. 486 (1966), or with any effective warnings.

17 139. The Defendants' misconduct directly resulted in the unjust criminal conviction of
18 Plaintiff, thereby denying Plaintiff her right against self-incrimination and to due process
19 guaranteed by the U.S. Constitution.

20 140. Furthermore, in the manner described more fully above, the Defendants, acting
21 individually, jointly, and in conspiracy with each other, deliberately engaged in arbitrary and
22 conscience-shocking conduct that contravened fundamental canons of decency and fairness and
23 violated Plaintiff's substantive due process rights under the Fourteenth Amendment.

1 141. The above-described misconduct took place under the direct supervision of one or
2 more of the Defendants, including but not limited to Defendant Dunlap. The constitutional
3 violations alleged herein occurred at these Defendants' direction, and these Defendants were
4 deliberately indifferent thereto. Absent knowing participation by these Defendants, including but
5 not limited to Defendant Dunlap, the misconduct alleged in this Complaint could not have
6 occurred.

7 142. The misconduct described in this Count was objectively unreasonable and was
8 undertaken intentionally, with reckless and deliberate indifference to the rights of others.

9 143. The Defendants were acting under color of law and within the scope of their
10 employment when they took these actions.

11 144. Plaintiff's injuries were caused by the official policies of the Defendant City and
12 the Department, by the practices and customs of the Defendant City and the Department, as well
13 as by the actions of final policymaking officials for the Defendant City and the Department.

14 145. At all times relevant and for a period of time prior thereto, and upon information
15 and belief, Defendant City did not have adequate rules, regulations, policies, and procedures
16 governing questioning of criminal suspects, questioning of mentally ill suspects, in-court
17 testimony, preparation and presentation of witness testimony, preservation and disclosure of
18 investigative materials and evidence, and training, supervision, and discipline of employees and
19 agents of the Defendant City, including employees and agents of the Department. The Defendant
20 City was aware of the need for adequate policies, training, and supervision, was deliberately
21 indifferent to the need, and made a deliberate choice not to adopt adequate policies, training, or
22 supervision, all of which was an official policy.

1 146. In addition, at all times relevant and for a period of time prior thereto, Defendant
2 City had notice of a widespread practice by its officers and agents under which individuals
3 suspected of criminal activity, such as Plaintiff, were routinely deprived of exculpatory evidence,
4 were subjected to criminal proceedings based on false evidence, were forced to provide
5 involuntary inculpatory statements, and/or were deprived of their liberty without probable cause,
6 such that individuals were routinely implicated in crimes to which they had no connection and
7 for which there was scant evidence to suggest that they were involved.

8 147. These widespread practices were allowed to flourish because the leaders,
9 supervisors, and policymakers of the Defendant City directly encouraged and were thereby the
10 moving force behind the very type of misconduct at issue by failing to adequately train,
11 supervise, and discipline their officers, agents, and employees who withheld material evidence,
12 fabricated false evidence and witness testimony, coerced false confessions and statements from
13 suspects, and pursued wrongful prosecutions and convictions.

14 148. The above-described widespread practices, which were so well-settled as to
15 constitute the *de facto* policy of the Defendant City, were allowed to exist because municipal
16 policymakers with authority over the same exhibited deliberate indifference to the problem,
17 thereby effectively ratifying it.

18 149. The misconduct described in this Count was undertaken pursuant to the policy
19 and practices of the Defendant City in that the constitutional violations committed against
20 Plaintiff were committed with the knowledge or approval of persons with final policymaking
21 authority for the City and the Department, or were actually committed by persons with final
22 policymaking authority.
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1 150. The misconduct described in this Count was also undertaken pursuant to the
2 policy and practices of the Defendant County in that the constitutional violations committed
3 against Plaintiff were committed with the knowledge or approval of persons with final
4 policymaking authority for the County, or were actually committed by persons with final
5 policymaking authority, such as Defendant Dunlap. Defendant Dunlap was the final policymaker
6 for the Defendant County on matters relating to criminal investigations and prosecutions and the
7 Washoe County District Attorney's Office.

8 151. The policies, practices, and customs set forth above were the moving force behind
9 the numerous constitutional violations in this case and directly and proximately caused Plaintiff
10 to suffer the grievous and permanent injuries and damages set forth above.

11 152. Plaintiff's injuries were caused by officers, agents, and employees of the
12 Defendants City and County, including but not limited to the individually named Defendants,
13 who acted pursuant to the policies, practices, and customs set forth above in engaging in the
14 misconduct described in this Count.

15 153. As a result of Defendants' misconduct described in this Count, Plaintiff suffered
16 loss of liberty, great mental anguish, humiliation, degradation, physical and emotional pain and
17 suffering, and other grievous and continuing injuries and damages as set forth above.

18 **Count II: 42 U.S.C. § 1983 – Fourteenth Amendment**

19 **Due Process**

20 154. Each preceding paragraph of this Complaint is incorporated as if restated fully
21 herein.
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1 155. In the manner described more fully above, the Defendants, acting as investigators,
2 individually, jointly and in conspiracy with each other, deprived Plaintiff of her constitutional
3 right to due process and a fair trial.

4 156. The Defendants fabricated and solicited false evidence, as well as withheld
5 exculpatory evidence from Plaintiff and from state prosecutors, among others, thereby
6 misleading and misdirecting the criminal prosecution of Plaintiff. The Defendants continued
7 their investigation of the Plaintiff despite the fact that they knew, or were deliberately indifferent
8 to the Plaintiff's innocence, and the results of the investigation were used to convict the Plaintiff.
9 Moreover, Plaintiff used investigative techniques that were so coercive and abusive that they
10 knew, or were deliberately indifferent to the fact that those techniques would yield false
11 information that was used to convict the Plaintiff.

12 157. The Defendants' misconduct directly resulted in the unjust criminal conviction of
13 Plaintiff, thereby denying her constitutional right to due process and a fair trial guaranteed by the
14 Fourteenth Amendment. Absent this misconduct, the prosecution of Plaintiff could not and
15 would not have been pursued, and she would not have been convicted.

16 158. The above-described misconduct took place under the direct supervision of one or
17 more of the Defendants, including but not limited to Defendant Dunlap. The constitutional
18 violations alleged herein occurred at these Defendants' direction, and these Defendants were
19 deliberately indifferent thereto. Absent knowing participation by these Defendants, including but
20 not limited to Defendant Dunlap, the misconduct alleged in this Complaint could not have
21 occurred.

22 159. The misconduct described in this Count was objectively unreasonable and was
23 undertaken intentionally, with reckless and deliberate indifference to the rights of others.

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1 160. The Defendants were acting under color of law and within the scope of their
2 employment when they took these actions.

3 161. As a result of Defendants' misconduct described in this Count, Plaintiff suffered
4 loss of liberty, great mental anguish, humiliation, degradation, physical and emotional pain and
5 suffering, and other grievous and continuing injuries and damages as set forth above.

6 162. Defendants' misconduct described in this Count was undertaken pursuant to the
7 policies, practices, and customs of the Defendants City and County, and by Defendants who
8 were final policymakers for the Defendants City and County, in the manner described more fully
9 above.

10 **Count III: 42 U.S.C. § 1983 – Due Process – Federal Malicious Prosecution**

11 163. Each preceding paragraph of this Complaint is incorporated as if restated fully
12 herein.

13 164. In the manner described more fully above, Defendants, acting as investigators,
14 individually, jointly, and in conspiracy with each other, accused Plaintiff of criminal activity and
15 exerted influence to initiate, continue, and perpetuate judicial proceedings against Plaintiff
16 without any probable cause for doing so and in spite of the fact that they knew Plaintiff was
17 innocent.

18 165. Plaintiff's criminal proceedings were terminated in her favor, in a manner
19 indicative of innocence.

20 166. In so doing, Defendants caused Plaintiff to be unreasonably seized without
21 probable cause and deprived of her liberty, in violation of Plaintiff's rights secured by the Fourth
22 and Fourteenth Amendments.

1 167. Defendants deprived Plaintiff of fair state criminal proceedings, including the
2 chance to defend herself during those proceedings, resulting in a deprivation of her liberty.

3 168. In addition, Defendants subjected Plaintiff to arbitrary governmental action that
4 shocks the conscience in that Plaintiff was deliberately and intentionally framed for a crime of
5 which she was totally innocent, through Defendants' misconduct. Defendants' actions
6 contravened fundamental canons of decency and fairness and violated Plaintiff's rights under the
7 Fourteenth Amendment.

8 169. The above-described misconduct took place under the direct supervision of one or
9 more of the Defendants, including but not limited to Defendant Dunlap. The constitutional
10 violations alleged herein occurred at these Defendants' direction, and these Defendants were
11 deliberately indifferent thereto. Absent knowing participation by these Defendants, including but
12 not limited to Defendant Dunlap, the misconduct alleged in this Complaint could not have
13 occurred.

14 170. The misconduct described in this Count was objectively unreasonable and was
15 undertaken intentionally, with reckless and deliberate indifference to the rights of others.

16 171. The Defendants were acting under color of law and within the scope of their
17 employment when they took these actions.

18 172. As a result of Defendants' misconduct described in this Count, Plaintiff suffered
19 loss of liberty, great mental anguish, humiliation, degradation, physical and emotional pain and
20 suffering, and other grievous and continuing injuries and damages as set forth above.

21 173. Defendants' misconduct described in this Count was undertaken pursuant to the
22 policies, practices, and customs of the Defendants City and County, and by Defendants who
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1 were final policymakers for the Defendants City and County, in the manner described more fully
2 above.

3 **Count IV: 42 U.S.C. § 1983 – Failure to Intervene**

4 174. Each preceding paragraph of this Complaint is incorporated as if restated fully
5 herein.

6 175. In the manner described more fully above, during the constitutional violations
7 described herein, one or more of the Defendants stood by without intervening to prevent the
8 violation of Plaintiff's constitutional rights, even though they had the opportunity to do so.

9 176. The above-described misconduct took place under the direct supervision of one or
10 more of the Defendants, including but not limited to Defendant Dunlap. The constitutional
11 violations alleged herein occurred at these Defendants' direction, and these Defendants were
12 deliberately indifferent thereto. Absent knowing participation by these Defendants, including but
13 not limited to Defendant Dunlap, the misconduct alleged in this Complaint could not have
14 occurred.

15 177. The misconduct described in this Count was objectively unreasonable and was
16 undertaken intentionally, with reckless and deliberate indifference to the rights of others.

17 178. The Defendants were acting under color of law and within the scope of their
18 employment when they took these actions.

19 179. As a result of Defendants' misconduct described in this Count, Plaintiff suffered
20 loss of liberty, great mental anguish, humiliation, degradation, physical and emotional pain and
21 suffering, and other grievous and continuing injuries and damages as set forth above.

22 180. Defendants' misconduct described in this Count was undertaken pursuant to the
23 policies, practices, and customs of the Defendants City and County, and by Defendants who
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1 were final policymakers for the Defendants City and County, in the manner described more fully
2 above.

3 **Count V: 42 U.S.C. § 1983 – Conspiracy to Deprive Constitutional Rights**

4 181. Each preceding paragraph of this Complaint is incorporated as if restated fully
5 herein.

6 182. Prior to Plaintiff's conviction, all of the Defendants, acting in concert with other
7 co-conspirators, known and unknown, reached an agreement among themselves to frame
8 Plaintiff for a crime she did not commit and thereby to deprive her of her constitutional rights, all
9 as described in this Complaint.

10 183. In so doing, these co-conspirators conspired to accomplish an unlawful purpose
11 by an unlawful means. In addition, these co-conspirators agreed among themselves to protect one
12 another from liability by depriving Plaintiff of these rights.

13 184. In furtherance of their conspiracy, each of these co-conspirators committed over
14 acts and were otherwise willful participants in joint activity.

15 185. The misconduct described in this Count was objectively unreasonable and was
16 undertaken intentionally, with reckless and deliberate indifference to the rights of others.

17 186. The Defendants were acting under color of law and within the scope of their
18 employment when they took these actions.

19 187. As a result of Defendants' misconduct described in this Count, Plaintiff suffered
20 loss of liberty, great mental anguish, humiliation, degradation, physical and emotional pain and
21 suffering, and other grievous and continuing injuries and damages as set forth above.

22 188. Defendants' misconduct described in this Count was undertaken pursuant to the
23 policies, practices, and customs of the Defendants City and County, and by Defendants who
24

1 were final policymakers for the Defendants City and County, in the manner described more fully
2 above.

3 **Count VI: Nevada State Law – Malicious Prosecution**

4 189. Each paragraph of this Complaint is incorporated as if restated fully herein.

5 190. In the manner described more fully above, the Defendants, acting as investigators,
6 individually, jointly, and in conspiracy with each other, and maliciously, instituted or continued
7 the prosecution of Plaintiff without probable cause. As a consequence of the criminal
8 prosecution, Plaintiff was unlawfully seized, deprived of liberty, and wrongfully convicted of a
9 crime of which she is innocent.

10 191. Plaintiff's criminal prosecution was terminated in her favor in a manner indicative
11 of innocence.

12 192. The Defendants were acting under color of law and within the scope of their
13 employment when they took these actions.

14 193. Through the doctrine of *respondeat superior*, Defendants City and County are
15 liable as principals for all torts committed by their employees or agents, including the
16 misconduct by the Defendants described in this Count.

17 194. As a direct and proximate result of the Defendants' actions, Plaintiff's rights were
18 violated and she suffered injuries and damages, including but not limited to loss of liberty,
19 physical sickness and injury, emotional pain and suffering, and other grievous and continuing
20 injuries and damages as set forth above.

21 **Count VII: Nevada State Law – Abuse of Process**

22 195. Each paragraph of this Complaint is incorporated as if restated fully herein.

1 196. The Defendants took the actions described more fully above, including instituting
2 and continuing a criminal proceeding against the Plaintiff, with an ulterior purpose other than
3 resolving a legal dispute or resolving the guilt or innocence of Plaintiff in the murder of Michelle
4 Mitchell. The Defendants also committed willful acts in the use of the legal process which were
5 not proper in the regular conduct of Plaintiff's criminal proceeding.

6 197. The Defendants were acting under color of law and within the scope of their
7 employment when they took these actions.

8 198. Through the doctrine of *respondeat superior*, Defendants City and County are
9 liable as principals for all torts committed by their employees or agents, including the
10 misconduct by the Defendants described in this Count.

11 199. As a direct and proximate result of the Defendants' actions, Plaintiff's rights were
12 violated and she suffered injuries and damages, including but not limited to loss of liberty,
13 physical sickness and injury, emotional pain and suffering, and other grievous and continuing
14 injuries and damages as set forth above.

15 **Count VIII: Nevada State Law – Intentional Infliction of Emotional Distress**

16 200. Each paragraph of this Complaint is incorporated as if restated fully herein.

17 201. In the manner described more fully above, Defendants, acting as investigators,
18 individually, jointly, and in conspiracy with each other, engaged in extreme and outrageous
19 conduct with the intention of or reckless disregard for, causing Plaintiff emotional distress, and
20 Plaintiff suffered severe or extreme emotional distress. The Defendants' misconduct was the
21 actual and proximate cause of Plaintiff's severe or extreme emotional distress.

22 202. The Defendants were acting under color of law and within the scope of their
23 employment when they took these actions.

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1 203. Through the doctrine of *respondeat superior*, Defendants City and County are
2 liable as principals for all torts committed by their employees and agents, including the
3 misconduct by Defendants described in this Count.

4 204. As a direct and proximate result of the Defendants' actions, Plaintiff's rights were
5 violated and she suffered injuries and damages, including but not limited to loss of liberty,
6 physical sickness and injury, emotional pain and suffering, and other grievous and continuing
7 injuries and damages as set forth above.

8 **Count IX: Nevada State Law – Civil Conspiracy**

9 205. Each paragraph of this Complaint is incorporated as if restated fully herein.

10 206. In the manner described more fully above, the Defendants, acting in concert with
11 other known and unknown co-conspirators conspired and intended by concerted action to
12 accomplish an unlawful objective for the purpose of harming Plaintiff, which resulted in damage
13 to Plaintiff.

14 207. In furtherance of the conspiracy, the Defendants committed overt acts and were
15 otherwise willful participants in joint activity.

16 208. The Defendants were acting under color of law and within the scope of their
17 employment when they took these actions.

18 209. Through the doctrine of *respondeat superior*, Defendants City and County are
19 liable as principal for all torts committed by their employees or agents, including the misconduct
20 by Defendants described in this Count.

21 210. As a direct and proximate result of the Defendants' actions, Plaintiff's rights were
22 violated and she suffered injuries and damages, including but not limited to loss of liberty,
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1 physical sickness and injury, emotional pain and suffering, and other grievous and continuing
2 injuries and damages as set forth above.

3 **Count X: Nevada State Law – *Respondeat Superior***

4 211. Each paragraph of this Complaint is incorporated as if restated fully herein.

5 212. While committing the acts alleged in the preceding paragraphs, Defendants
6 Dennison and Kimpton were employees of the Defendant City, acting at all relevant times within
7 the scope of their employment.

8 213. While committing the acts alleged in the preceding paragraphs, Defendant Dunlap
9 was an employee of Defendant County, acting at all relevant times within the scope of his
10 employment.

11 214. Defendants City and County are liable as principal for all torts committed by their
12 agents.

13 **Count XI: Nevada State Law – Indemnification**

14 215. Each paragraph of this Complaint is incorporated as if restated fully herein.

15 216. Nevada law provides that the Defendants City and County are directed to pay any
16 tort judgment for compensatory damages for which their employees are liable within the scope of
17 their employment activities.

18 217. The Law Enforcement Defendants were employees of the Defendants City and
19 County and acted within the scope of their employment at all times relevant in committing the
20 actions and omissions described herein.

21 WHEREFORE, Plaintiff, CATHY WOODS (a/k/a ANITA CARTER), by and through
22 her Personal Representative, LINDA WADE, respectfully requests that this Court enter a
23 judgment in her favor and against Defendants CITY OF RENO, NEVADA, former Reno Police
24

1 Lieutenant LAWRENCE C. DENNISON, former Reno Police Detective JOHN L. KIMPTON,
2 former Shreveport Police Detective DONALD W. ASHLEY, former Shreveport Police Detective
3 CLARENCE A. "JACKIE" LEWIS, former Washoe County District Attorney CALVIN R. X.
4 DUNLAP, WASHOE COUNTY, NEVADA, and DOUGLAS MATTHEW BURKS, M.D.

5 **JURY DEMAND**

6 Plaintiff, CATHY WOODS (a/k/a ANITA CARTER), by and through her Personal
7 Representative, LINDA WADE, hereby demands a trial by jury pursuant to Federal Rule of Civil
8 Procedure 38(b) on all issues so triable.

9 Respectfully submitted,

10 CATHY WOODS (a/k/a ANITA CARTER),
11 by and through her Personal Representative,
12 LINDA WADE

13 By: /s/ Edmund J. Gorman, Jr.
14 Designated Resident Nevada Counsel
15 for Plaintiff

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*Will comply with LR IA 11-2 within 30 days.

*Counsel for Plaintiff Cathy Woods (a/k/a Anita Carter), by and through her Personal
Representative, Linda Wade*