

**U.S. District Court  
Southern District of Florida (West Palm Beach)  
CIVIL DOCKET FOR CASE #: 9:11-cv-81199-KLR**

Curtis v. Veeramachaneni et al  
Assigned to: Senior Judge Kenneth L. Ryskamp  
Referred to: Magistrate Judge Patrick A. White  
Cause: 42:1983 State Prisoner Civil Rights

Date Filed: 10/28/2011  
Jury Demand: Defendant  
Nature of Suit: 550 Prisoner: Civil Rights  
Jurisdiction: Federal Question

**Plaintiff**

**James T. Curtis**  
Prisoner ID: 166314

represented by **James T. Curtis**  
166314  
South Bay Correctional Facility  
PO Box 7171  
South Bay, FL 33493  
PRO SE

V.

**Defendant**

**Dentist Mamatha Veeramachaneni**  
*Individual Capacity*

represented by **Donald Anthony Chinquina**  
Wiederhold, Moses, Kummerlen  
& Waronicki, Pa  
560 Village Blvd.  
Suite 240  
West Palm Beach, FL 33409  
561-615-6775  
Fax: 561-615-7225  
Email: [dchinquina@wmrfla.com](mailto:dchinquina@wmrfla.com)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant**

**Dental Assistant Ms. Boldin**  
*Individual Capacity*

represented by **Donald Anthony Chinquina**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant**

**Ms. Nancy Finisse**  
*Health Services Administrator, Individual  
Capacity*

represented by **Donald Anthony Chinquina**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
10/28/2011	<u>1</u>	COMPLAINT under the Civil Rights Act 42 U.S.C. 1983 against Ms. Boldin, Nancy Finisse, Mamatha Veeramachaneni. Filing fee \$ 350.00. IFP Filed, filed by James T. Curtis. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Exhibit, # <u>3</u> Exhibit)(cbr) Modified on 10/28/2011 (cbr). (Entered: 10/28/2011)
10/28/2011	2	Judge Assignment to Senior Judge Kenneth L. Ryskamp (cbr) (Entered: 10/28/2011)
10/28/2011	3	Clerks Notice of Magistrate Judge Assignment to Magistrate Judge Patrick A. White. Pursuant to Administrative Order 2003-19 for a ruling on all pre-trial, non-dispositive matters and for a Report and Recommendation on any dispositive matters. (cbr) (Entered: 10/28/2011)

10/28/2011	<u>4</u>	MOTION for Leave to Proceed in forma pauperis by James T. Curtis. (cbr) (Entered: 10/28/2011)
10/31/2011	<u>5</u>	ORDER OF INSTRUCTIONS TO PRO SE CIVIL RIGHTS LITIGANTS. Signed by Magistrate Judge Patrick A. White on 10/31/2011. (br) (Entered: 11/01/2011)
10/31/2011	<u>6</u>	ORDER permitting Plaintiff to Proceed without Prepayment of the Filing Fee but Establishing Debt to Clerk of \$350.00; granting <u>4</u> Motion for Leave to Proceed in forma pauperis to the extent that the plaintiff need not prepay even a partial filing fee in this case, or to prepay costs such as for service of process. Signed by Magistrate Judge Patrick A. White on 10/31/2011. (br) (Entered: 11/01/2011)
11/17/2011	<u>7</u>	Summons Issued as to Ms. Boldin, Nancy Finisse, Mamatha Veeramachaneni. (jua) (Entered: 11/17/2011)
11/17/2011	<u>8</u>	REPORT AND RECOMMENDATIONS on 42 USC 1983 case re <u>1</u> Complaint, filed by James T. Curtis. Recommending 1. The case shall proceed against Dr. Veeramachaneni, Ms. Boldin and Ms. Finisse for denial of adequate medical treatment. 2. Service will be ordered by separate order. 3. The Court views motions to dismiss with disfavor as the standard of review is the same as in this preliminary screening, and issues of immunity will be determined upon a fuller development of the record.. Objections to RR due by 12/5/2011. Signed by Magistrate Judge Patrick A. White on 11/15/2011. (tw) (Entered: 11/17/2011)
11/22/2011	<u>9</u>	ORDER RE SERVICE OF PROCESS REQUIRING PERSONAL SERVICE UPON AN INDIVIDUAL. The United States Marshal shall serve a copy of the complaint and appropriate summons upon: Mamatha Veeramachaneni, Dentist, South Bay Correctional Facility, 600 U.S. Highway 27 South, South Bay, FL 33493; Ms. Boldin, Dental Assistant, South Bay Correctional Facility, 600 U.S. Highway 27 South, South Bay, FL 33493 and Ms. Nancy Finisse, Health Services Administrator, South Bay Correctional Facility, 600 U.S. Highway 27 South, South Bay, FL 33493. Signed by Magistrate Judge Patrick A. White on 11/21/2011. (tw) (Entered: 11/22/2011)
11/23/2011	<u>10</u>	Summons Issued as to Ms. Boldin. (br) (Entered: 11/23/2011)
11/23/2011	<u>11</u>	Summons Issued as to Nancy Finisse. (br) (Entered: 11/23/2011)
11/23/2011	<u>12</u>	Summons Issued as to Mamatha Veeramachaneni. (br) (Entered: 11/23/2011)
12/22/2011	<u>13</u>	SUMMONS (Affidavit) Returned Executed on <u>1</u> Complaint, Nancy Finisse served on 12/21/2011, answer due 1/11/2012. (ar2) (Entered: 12/23/2011)
12/22/2011	<u>14</u>	SUMMONS (Affidavit) Returned Executed on <u>1</u> Complaint, Ms. Boldin served on 12/21/2011, answer due 1/11/2012. (ar2) (Entered: 12/23/2011)
01/05/2012	<u>15</u>	MOTION/PETITION Requesting Court Order to Have the United States Marshal's Service Serve Petitioner's Complaint and Summons Upon Defendant Mamatha Veeramachaneni a Second Time or Effect Service by Serving a Substitute as the First Attempt was Unsuccessful and the Marshal's Service did not Effect Substitute Service as this Honorable Court Ordered by James T. Curtis. Responses due by 1/23/2012 (System updated)(jua) (Entered: 01/05/2012)
01/06/2012	<u>16</u>	MOTION for Extension of Time to Answer Complaint and Motion to Direct Plaintiff to File a Complete Version of Complaint by Ms. Boldin re <u>1</u> Complaint, by Nancy Finisse, Mamatha Veeramachaneni. Responses due by 1/23/2012 (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Deposition)(Chinquina, Donald) (Entered: 01/06/2012)
01/09/2012	<u>17</u>	ORDER granting <u>16</u> Defendant's Motion for Extension of Time to Answer complaint. The plaintiff shall file a COMPLETE COMPLAINT INCLUDING THE MISSING PAGES SUPPLIED TO THE DEFENDANTS ON OR BEFORE 1/30/12. The defendants shall have twenty days to answer, following the filing of the complete complaint.. Signed by Magistrate Judge Patrick A. White on 1/9/2012. (cz) (Entered: 01/09/2012)
01/09/2012	<u>18</u>	ORDER OF DIRECTIONS TO MARSHAL TO FILE RETURN FOR DEFENANT VEERAMACHANENI and Granting <u>15</u> Motion to Appoint Special Process Server. Signed by Magistrate Judge Patrick A. White on 1/9/2012. (tw)

		(Entered: 01/09/2012)
01/09/2012		Set/Reset Deadlines/Hearings as per DE 17 : Miscellaneous (complete complaint) Deadline 1/30/2012. (lk) (Entered: 01/09/2012)
01/19/2012	<u>19</u>	SUMMONS (Affidavit) Returned Executed on <u>1</u> Complaint, Mamatha Veeramachaneni served on 1/4/2012, answer due 1/25/2012. (jua) (Entered: 01/19/2012)
01/25/2012	<u>20</u>	NOTICE of Compliance by James T. Curtis re 17 ORDER granting <u>16</u> Defendant's Motion for Extension of Time to Answer complaint. The plaintiff shall file a COMPLETE COMPLAINT INCLUDING THE MISSING PAGES SUPPLIED TO THE DEFENDANTS ON OR BEFORE 1/30/12 (jua) (Entered: 01/26/2012)
02/07/2012	<u>21</u>	ANSWER and Affirmative Defenses to Complaint with Jury Demand by Ms. Boldin, Nancy Finisse, Mamatha Veeramachaneni.(Chinquina, Donald) (Entered: 02/07/2012)
02/09/2012	<u>22</u>	ORDER ADOPTING REPORT AND RECOMMENDATIONS. Signed by Senior Judge Kenneth L. Ryskamp on 2/7/2012. (lbc) (Entered: 02/09/2012)
02/09/2012	<u>23</u>	SCHEDULING ORDER: Amended Pleadings due by 6/21/2012. Discovery due by 6/7/2012. Joinder of Parties due by 6/21/2012. Motions due by 7/12/2012.. Signed by Magistrate Judge Patrick A. White on 2/9/2012. (tw) (Entered: 02/09/2012)
02/27/2012	<u>25</u>	MOTION for Permission to Engage in the Discovery Process ( Responses due by 3/15/2012), MOTION for Leave of Court to Extend the Presumptive Limitation of the Amount of Interrogatories to be asked by James T. Curtis. (yha) (Entered: 02/28/2012)
02/28/2012	<u>24</u>	MOTION for Request to Extend the Time the Limits of this Court's Order Scheduling Pretrial Proceedings when the Plaintiff is Proceeding Pro-SE re <u>23</u> Scheduling Order by James T. Curtis. Responses due by 3/16/2012 (yha) (Entered: 02/28/2012)
02/29/2012	<u>26</u>	RESPONSE in Opposition re <u>24</u> MOTION for Extension of Time the Limits of this Court's Order Scheduling Pretrial Proceedings when the Plaintiff is Proceeding Pro-SE re <u>23</u> Scheduling Order filed by Ms. Boldin, Nancy Finisse, Mamatha Veeramachaneni. (Chinquina, Donald) (Entered: 02/29/2012)
02/29/2012	<u>27</u>	RESPONSE in Opposition re <u>25</u> MOTION for Discovery MOTION for Extension of Time the Presumptive Limitation of the Amount of Interrogatories to be asked filed by Ms. Boldin, Nancy Finisse, Mamatha Veeramachaneni. (Chinquina, Donald) (Entered: 02/29/2012)
03/07/2012	<u>28</u>	REPLY In Opposition to <u>27</u> Response in Opposition to Motion, <u>26</u> Response in Opposition to Motion, by James T. Curtis. (cqs) (Entered: 03/07/2012)
03/21/2012	<u>29</u>	NOTICE by Ms. Boldin, Nancy Finisse, Mamatha Veeramachaneni re <u>27</u> Response in Opposition to Motion, <u>26</u> Response in Opposition to Motion, <i>Correction of Record</i> (Chinquina, Donald) (Entered: 03/21/2012)
03/21/2012	30	ORDER denying <u>24</u> plaintiff's Motion for Extension of Time for the reasons in defendants reply DE#26; denying <u>25</u> plaintiff's Motion for Discovery; denying <u>25</u> Motion for Extension of Time for the reasons stated in defendants response (DE#27), and including correction in DE#29.. Signed by Magistrate Judge Patrick A. White on 3/21/2012. (cz) (Entered: 03/21/2012)
06/01/2012	<u>31</u>	Plaintiff's Notice of First Admissions to Defendant Ms. Boldin Dental Assistant by James T. Curtis (ail) (Entered: 06/01/2012)
06/01/2012	<u>32</u>	Plaintiff's NOTICE of First Interrogatories to Defendant Ms. Boldin Dental Assistant by James T. Curtis (ail) (Entered: 06/01/2012)
06/01/2012	<u>33</u>	Plaintiff's NOTICE of First Admissions to Defendant Nancy Finnise by James T. Curtis (ail) (Entered: 06/01/2012)
06/01/2012	<u>34</u>	Plaintiff's NOTICE of First Admissions to Defendant Mamatha Veeramachaneni by James T. Curtis (ail) (Entered: 06/01/2012)

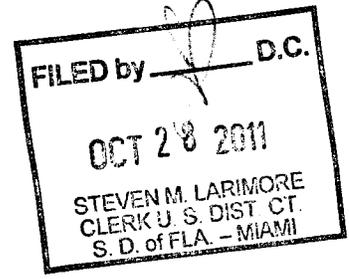
06/01/2012	<u>35</u>	Plaintiff's NOTICE of First Interrogatories to Defendant Nancy Finisse H.S.A. at SBCF by James T. Curtis (ail) (Entered: 06/01/2012)
06/01/2012	<u>36</u>	Plaintiff's NOTICE of First Interrogatories to Defendant Mamatha Veeramachaneni Dentist at South Bay Correctional Facility by James T. Curtis (ail) (Entered: 06/01/2012)
06/01/2012	<u>37</u>	MOTION to Compel <i>Discovery from Defendant</i> ( Responses due by 6/18/2012), MOTION for Extension of Time to Complete Discovery, MOTION for Court Order Instructing the Warden to allow Plaintiff to access his Medical Files for Discovery Documents need to get copied at Plaintiffs Cost by James T. Curtis. (ail) (Entered: 06/01/2012)
06/01/2012	<u>38</u>	MOTION to Produce Documents by James T. Curtis. (ail) (Entered: 06/01/2012)
06/04/2012	39	ORDER deferring ruling on <u>37</u> Motion to Compel better responses so that defendants shall reply ; denying <u>37</u> Motion for Extension of Time to Complete Discovery; denying <u>37</u> Motion ; denying <u>38</u> Motion to Produce, this is a discovery request and must be sent directly to the defendants.. Signed by Magistrate Judge Patrick A. White on 6/4/2012. (cz) (Entered: 06/04/2012)
06/11/2012	<u>40</u>	Petition For Rehearing re 39 Order on Motion to Compel,, Order on Motion for Extension of Time to Complete Discovery,, Order on Motion for Miscellaneous Relief,, Order on Motion to Produce, and or opposition to the Magistrate's Denial Of Motion To compel discovery by James T. Curtis. (cqs) (Entered: 06/11/2012)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No.** 11-CV-81199 RYSKAMP/WHITE

**The attached hand-written  
document  
has been scanned and is  
also available in the  
SUPPLEMENTAL  
PAPER FILE**

cat/div 1983/550/WPB  
Case # \_\_\_\_\_  
Judge \_\_\_\_\_ Mag \_\_\_\_\_ UNITED STATES DISTRICT COURT  
Motn lfp yes Fee pd \$ \_\_\_\_\_ SOUTHERN DISTRICT OF FLORIDA  
Receipt # \_\_\_\_\_ Civil Case Number: \_\_\_\_\_



JAMES T. CURTIS DC#166314  
(Write the full name of the plaintiff)

vs.

Dentist MAMATHA VEERAMACHANENI  
*Individual Capacity*

Dental Assistant MS. BOLDIN  
*Individual Capacity*

MS. Nancy Finisse  
*Individual Capacity*

\_\_\_\_\_  
(Write the full name of the defendant/s in this case)

COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

I. Party Information

A. Plaintiff: James T. Curtis

Address: SBCF P.O. Box 7171 South Bay, FL 33493

Inmate/Prison No.: 166314

Year of Birth: 8-19-74 (Do not include day or month, pursuant to Fed. R. Civ. P 5.2)

(Write your name, address and prison/inmate number, if applicable)

vs.

B. Defendant: Mamatha Veeramachaneni Defendant: Ms. Boldin

Official Position: Dentist Official Position: Dental Assistant

Place of Employment: South Bay CF Place of Employment: South Bay CF

(Write the full name of each defendant, official position and place of employment. Attach a separate page if you need additional space for additional defendants.)

B. DEFENDANT CONTINUED

Defendant: Ms. Nancy FINISSE

OFFICIAL POSITION: Health Services Administrator (HSA)

PLACE OF EMPLOYMENT: South Bay Correctional Facility.

## II. Statement of Claim

Briefly describe the facts of your case. Describe how each defendant is involved, names of other persons involved, and dates and places. Each claim should be stated in a separately numbered paragraph. Please use short and plain statements, with separately numbered paragraphs indicating why the relief requested should be granted. Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

"SEE Attached"

## III. Relief Requested

Briefly state what you are requesting from the Court (what do you want the Court to do). Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

- A.) This Court declare that the acts and omissions described herein violate plaintiff's rights under the Constitution and laws of the United States;
- B.) All cost and fees be set against the defendants;
- C.) Order Defendants to fix Plaintiff's dental conditions by outside Dentist;
- D.) Order Defendants to pay Compensatory damages in the amount of \$150,000 dollars
- Order Defendants to pay punitive damages of 350,000 and nominal damages against each named defendant individually.
- E.) Grant all other just and Equitable relief this Honorable Court deems necessary.

## STATEMENT OF CLAIM

- 1.) South Bay Correctional Facility's Dental Department is made up of only the following staff. Defendant DR. Mamatha Veeramanchaneni is the only full time dentist working Monday thru Thursday. Defendant Boldin is the only Dental Assistant who works Monday thru Friday and there is suppose to be another female Dentist who only works on Fridays, but Plaintiff has never seen this dentist even on Fridays. And yet there is over one thousand Eight hundred inmates housed at this Facility. Defendants are hereafter referred to as "DR. V. and Boldin."
- 2.) Defendant Nancy Finisse is the Health Services Administrator at South Bay Correctional Facility. She is in charge of all health Departments to include dental. She answers grievances and knows dental is way under staffed and chooses to not do anything. She is hereafter referred to as "HSA or Ms. Finisse."
- 3.) South Bay Correctional Facility is a Privately operated Prison which is operated by The GEO Group Inc. found in Boca Raton, Florida. South Bay Correctional Facility is hereafter referred to as "SBCF".
- 4.) All Plaintiff's grievances and Appeals on these matters have been exhausted with them all being Denied. Thus Plaintiff's only option now is to seek redress through this Honorable Court.
- 5.) SBCF's Dental Department is way understaffed. There is a two year current waiting list for services and DR. V. made a policy of only wanting to pull teeth as is cheaper and quicker. She refuses to do Root Canals and refused to even provide fillings for plaintiff.
- 6.) Plaintiff arrived at SBCF on 8-25-09 and has been to several Institutions since entering FDOC in March 2001. Upon arrival at most Institutions you see dental that day or within a week after arrival. Yet due to under staffing it took Plaintiff almost a year to see dental.

7.) Plaintiff's first visit to dental was by Sick-call on 6-10-10. Plaintiff was having severe pain on his upper and lower right teeth #s 2, 3, and 31. Also plaintiff had painful bleeding gums which cause Plaintiff severe pain, suffering and daily misery. DR. V. refused to address all these problems saying she only would address one complaint per visit. She gave her famous cover all diagnoses of all teeth possibly fractured. And because plaintiff refused to allow her to pull all his teeth she refused all treatment. Still to date plaintiff has pain with these teeth but DR. V. refuses treatment.

8.) Plaintiff's first call out to see dental is on 7-28-10 almost a year after arriving at SBCF. A DSAX Periodic Visual exam was done by DR. V. and Boldin. They told plaintiff that because he had less than two years left on his sentence he would never get to see dental for any treatment. They refused to do a dental plan due to timeframes. When Plaintiff tried to explain all his painful dental problems it fell upon deaf ears.

9.) On 8-31-10 plaintiff had to go to dental via Sick-call after biting a rock found in his beans on his food tray. Plaintiff had cut up gums, swollen gums and pain when trying to chew. Plaintiff told DR. V. and Boldin of his pain and they told plaintiff to get pain meds from his dorm. Plaintiff explained how he couldn't get pain meds by staff as they only would give them out when they felt like it and when they felt like it then it was only every six hours. DR. V. and Boldin told plaintiff to tough it out.

10.) Plaintiff returned to dental 3 days later on 9-3-10 still in pain that had gotten worse. Plaintiff's gums were more swollen and darker red and the pain in his teeth still hurting him. Finally DR. V. provided pain meds and antibiotics after three days of suffering unnecessarily.

11.) On 9-21-10 plaintiff returned to dental still having PAIN which also seemed to be coming from plaintiff's upper ~~LEFT~~ side molar teeth. Once again DR. V.'s famous cover all diagnoses possible fracture of tooth #14 which was used to justify pulling tooth #14 which could have been saved.

Puss, white bones sticking out of gums, gums dark red and swollen, and the sinus cavity still had the hole torn through it which was getting worse and more painful. DR. V. and Boldin didn't want to address plaintiff's serious dental problems saying they were normal when even a layman could see plaintiff's dental conditions needed a dentist attention. See declarations attached to complaint. DR. V. got upset at plaintiff for saying he would grieve her.

17.) DR. V. admits in dental records see dental records exhibit #3 that plaintiff reported to her of his severe pain, suffering and misery. Plaintiff reported of the torn sinus, bones sticking out of his gums plus the bad tooth that had a dental carrie or cavity that was found behind tooth # 14 when it was pulled. But DR. V. admits clearly on the dental record she advised plaintiff he needs to wait another 1-2 weeks for the discomfort to subside since it had just been a week since the extraction. She admits she did nothing for plaintiff's pain, suffering and misery.

18.) DR. V. admits in the dental record exhibit #3 that plaintiff got upset and stated he would grieve her and Boldin. But she incorrectly states plaintiff said he would see her in court. DR. V. never even stated in Grievance Log # 10-1161 about court. Also she doesn't mention how she and Boldin kicked me out of dental for saying I would grieve her. Also how she said she gets and responds to all grievances so it wouldn't do me any good. At this point plaintiff was kicked out of dental and told not to return and he wouldn't get any treatment and that's what took place and the reprisal started.

19.) Plaintiff never saw dental again for almost a month (10-18-10). All this time with no antibiotics or pain meds, plaintiff's conditions got worse and more painful. See Grievance Log # 10-1170 and Appeal Log # 10-6-32976 Exhibit C. Still no pain meds or antibiotics were given as DR. V. and Boldin were still very upset over plaintiff saying and filing grievances on her and Boldin for their misconduct.

28.) Plaintiff returned to dental on 5-9-11 and DR. V. was very hostile and asked plaintiff what his problem was in a nasty manner. Plaintiff tried to explain how in his upper right molar tooth there was what looked to be a cavity and between the two molars it was hurting awful. DR. V. told plaintiff to open his mouth and roughly shined the mirror in and pulled it out just a quickly not doing any exam. She stated nothing was wrong. And Boldin tried to offer plaintiff some sensitive tooth paste as plaintiff stated hot and cold foods/drinks hurt to eat and teeth more. But DR. V. told her not to give it to me. And DR. V. made it known to plaintiff she was still upset over the grievances. This was grieved in Grievance Log# 11-0408 and Appeal Log# 11-6-21782. See Exhibit L, No treatment done and plaintiff told to leave dental.

29.) Plaintiff found out of New HSA Ms. Finnise and requested a meeting with her which took place on 5-6-11 and plaintiff explained his dental problems even showing them to Finnise and told her of the ongoing reprisal by DR. V. and Boldin where they denied plaintiff needed dental treatment for writing grievances on them. Plaintiff pointed out cavity/carries, bleeding gums and Finnise admitted they needed dental care in her opinion. But she spoke to DR. V. and Boldin and went over plaintiff's grievance and sided with other defendants and refused to help plaintiff when she had the power to do so. See grievance Log# 11-0444 and Appeal Log# 11-6-18759. See Exhibit F, Finnise turns the blind eye and start to cover up and justify DR. V.'s and Boldin's clear misconduct and Constitutional violations.

30.) On about 6-9-11 plaintiff met with the listed defendants in dental. They told plaintiff that after GEO reviewed plaintiff's dental file they denied plaintiff's outside dental consultation with another dentist to find out what was wrong with plaintiff's dental problems. They stated that the dentist who supposedly comes in on Friday reviewed plaintiff's file and decided the treatment plaintiff was getting was all plaintiff needed. Yet she never looked at plaintiff's mouth and relied on falsified information.

As stated above to make her findings. Plaintiff grieved this matter in grievance Log# 11-0538 and Appeal Log# 11-6-20834 and Grievance Log# 11-0539 and Appeal Log# 11-6-20835. SEE Exhibits I & J. Thus plaintiff can't even get a fair exam to state all his dental problems or get them fixed. Thus forcing plaintiff to stay in severe pain, suffering, and misery on a daily basis. Plaintiff's conditions continue to get worse and now plaintiff believes he will have to have all molar teeth pulled causing permanent loss when relief could be provided by defendants.

31.) Plaintiff continues to beg Defendants to provide him needed dental care to stop his pain, suffering and misery. But they refuse because plaintiff they say threatened to write grievances on them and then did so and wrote complaints to State Governmental Agencies on Defendants. So Defendants purposely and knowingly punish plaintiff by refusing him needed treatment. Defendants DR. V. and Boldin have made good on their threats of no dental care because I grieved them.

32.) Plaintiff is treated for mental health conditions with counseling and medications. These conditions include Bipolar Disorder, Post Traumatic Stress Disorder and Depression. The actions of Defendants have aggravated these conditions by the pain suffering, and misery. And their refusal to provide treatment. Plaintiff has had to get extra counseling and medication amounts.

33.) Plaintiff has been in FDOC since 2001 and still to date has no disciplinary reports on his record. Plaintiff has been at SBCF since 8-25-09 and doesn't have any write up even on his contact card. Plaintiff is taking and has taken all vocational and self betterment classes offered to him. SBCF is the only facility that has vocational classes for mental health Level III inmates like Plaintiff. Plaintiff is always trying to better himself and has less than a year left on his sentence. Plaintiff wants to continue with all programs available to him.

34.) Yet Plaintiff is faced with numerous forms of retaliation and has been

threatened with a retaliatory transfer and bogus disciplinary reports for using the grievance process or filing and Court legal actions against staff in the past. Also SBCF will send you back to FDOC to force them to pay for all needed dental treatment. The Defendants have made it clear and are acting out on their punishment for plaintiff's use of the grievance process and his complaints to State Governmental Agencies on them. Also it very clear plaintiff will not receive any dental treatment unless ordered by the Court. So plaintiff brings this matter before the Honorable Court for redress.

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**IV. Jury Demand**

Are you demanding a jury trial?     Yes     No

Signed this 27<sup>th</sup> day of Oct, 20 11

Signature of Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 10-27-11

Signature of Plaintiff

FLORIDA DEPT. OF INSURANCE  
DIVISION OF RISK MANAGEMENT  
200 EAST GAINES Street  
TALLAHASSEE, FLORIDA 32399-0300

JAMES T. CURTIS DC# 166314  
Plaintiff

Vs.

N. FINISSE, HEALTH SERVICES Admin.  
Defendant

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## NOTICE OF INTENT TO SUE/WAIVER OF SOVEIGH IMMUNITY

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PLEASE TAKE NOTICE, that this Constitutes the "WRITTEN CLAIM" requirement pursuant to Section 768.28(6), Florida Statutes (1991). And that if this Cause is not sufficiently and timely resolved I will file Suit.

### WRITTEN CLAIM

on 5-16-11 I went to see Ms. N. Finisse the new Health Services Admin. I showed her my two Cavities, and explained my painful dental problems to her. She told me that GEO Group Inc. requested my file for review, I told her how Dentist Veeramachandni will not provide me with needed dental care for my painful dental conditions out of retaliation for my grievances I filed on dental, my complaints to Governmental Agencies, and my Notice of Intent to Sue filed 10-4-10. She told me she had to go with what the dentist told her and for me to wait on GEO Group Inc to finish their investigation. She also told me to wait on my dental grievance Log# 11-0372 which she denied/Returned on

FLORIDA DEPT. OF INSURANCE  
DIVISION OF RISK MANAGEMENT  
200 EAST GAINES St.  
TALLAHASSEE, FLORIDA 32399-0300

JAMES T. CURTIS DC#166314

Plaintiff

PROVIDED TO  
SOUTH BAY CORRECTIONAL FACILITY  
ON 10-4-10 FOR MAILING

v.s.

DENTIST MAMATHA VEERAMACHANENI

DENTAL Asst. MS. Boulden / Bolden

Defendants

## AMENDED NOTICE OF INTENT TO SUE / WAIVER OF SOVEIGH IMMUNITY

PLEASE TAKE NOTICE, that this Constitutes the  
"WRITTEN CLAIM" requirement pursuant to Section  
768.28(6), Florida Statutes (1991). And that if this Cause  
is not Sufficiently and timely resolved I will File Suit.

### WRITTEN CLAIM

On 9-22-10 plaintiff had a molder tooth pulled by defendant  
Veeramachaneni. She told me the tooth could be saved if I was on  
the street by a Root Canal. But she refused to do any Root Canal, she  
said my only option was to have the tooth pulled period. This is her  
solution to all teeth problems even small cavities because it is  
cheaper and quicker to pull the teeth than save them and she won't be  
bothered by any complaints or have to do any work on the teeth she pulls again.  
Thus because plaintiff was in severe pain and suffering and it hurt to chew  
plaintiff took the only option and had the tooth pulled. When she pulled the  
tooth she broke the bone around the tooth and others leaving sharpe pieces. She  
said she was going to leave it alone to see if it would heal back together. The  
molder tooth beside the pulled to has a painful cavity she won't fix. The hole

From the tooth has not healed. Plaintiff has an open Sore/hole that goes all the way through my Sinus cavity. My Sinus drains into my mouth through the open hole and water can be pushed through the hole, into my Sinus cavity and out my nose. The hole/sore is very Raw, Sore, Red, throbbing, Swollen, painful, and looks infected. The pain is unbearable and defendants are aware of this and refuse to do anything. Food gets trapped into the Sore/hole during eating. It causes a yellowish green and bloody colored drainage with a very foul odor. There are jagged broken pieces of bone sticking in and out of my gum causing severe pain and causing the wound not to heal. I'm unable to chew on the left side of my mouth due to the hole and other tooth with a cavity. On 9-28-10 I went to dental sickcall seeking help. The named defendants would not do any exam and refused to do an exam. Plaintiff tried to tell defendants his problems and what was going on. Yet defendants didn't want to hear it and kept stating plaintiff's conditions were normal and they couldn't do anything. I told them of my severe pain and suffering and how the wound looked infected. Defendants told plaintiff to get pain meds from the dorm which is only 200 to 300 mgs of Acetaminophen which is only given every six hours if staff will provide it. This was not enough to even take the edge of plaintiff's pain. I told defendants this was not normal and I was in severe pain and they wouldn't do anything. So I told them I was going to grieve the matter because they wouldn't do anything for my serious painful dental conditions. Defendant Veeramachaneni stated she would answer the grievance and the grievance would not do me any good. The defendants acted angry, hostile and put off towards plaintiff. They told me to leave dental and they weren't going to do anything for me because I said I was going to write them up in a grievance. They basically told me not to return to dental period. When plaintiff was getting his tooth pulled the defendants kept on making statements to me about inmates who write grievances and they don't go any place. They made comments how they don't deal with inmates who write grievances and how inmates who write grievances get moved from this facility quickly. They made it clear and plaintiff has seen classification and senior staff in

dental and talking about inmates who write grievances and upset them. It's dental's policy to pull teeth instead of fixing them as it's cheaper and less work on dental staff and they don't have to deal with any more problems with that tooth or teeth again. You're always told by defendants that nothing is wrong with you, that your conditions which are serious are normal and they say there is nothing they can do for you but pull teeth. Plaintiff's gums are getting cut up and sore with bleeding because he only has one molar in the upper left jaw and one in the lower right jaw so he cannot chew properly and it's painful to eat so I can't properly chew my food. Defendants won't do anything about this problem. It needs to be noted I arrived at facility in August 2009 and never saw dental. I never got called to dental until July 2010 almost a year later. During that visit defendants told me after telling them of my painful teeth and gum problems. That there were over eighteen hundred inmates on the compound and only one full time dentist. Thus the waiting list for dental work was over a year long and closer to two years long. Thus because I had less than two years left I most likely wouldn't get any dental work done. It's a common practice at this facility for staff to retaliate against inmates who use their grievance process and write them up, or their family and friends. The retaliation takes on many forms to include and most common retaliatory transfers to harsher prison conditions, false disciplinary reports, locked in confinement on the house, stating you refused treatment when you never did, and medical and dental staff get security staff to harass you for no reason, but to harass you daily. I was told basically not to return to dental and they refuse me needed treatment and I cannot work it out with them. Plus it's rumored they are getting me transferred. I'm asking for damages of twenty thousand dollars in compensatory damages, nominal damages, and sixty thousand dollars punitive damages against each defendant. Also all reprisal stopped and my dental conditions fixed by another dentist at this facility. This can be resolved if staff here wanted to, but they don't.

10-4-10

DATE

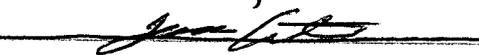
Respectfully Submitted

  
 James Curtis Dct# 166314-A2-210  
 South Bay, C.F.  
 PO Box 7171  
 South Bay, FL 33493

CERTIFICATE OF SERVICE

I HEREBY Certify a true and correct copy of this Amended Notice of Intent to Sue / Waiver of Sovereign Immunity has been furnished to all the parties listed below by U.S. Mail on this 4<sup>th</sup> day of October, 2010 by placing it into prison staff's hands for mailing.

Respectfully Submitted



James Curtis DC# 166314

South Bay CF

P.O. Box 7171

Mailed TO by U.S. First class mail.

South Bay, Florida 33493

1.) Florida Dept. of Insurance  
Division of Risk Management  
200 East Gaines Street  
Tallahassee, FL 32399-0300

2.) The GEO Group Inc.  
one Park place  
621 NW 53<sup>rd</sup> Street, Suite 700  
Boca Raton, FL 33487

3.) Defendants Mamatha Veeramachaneni and MS. Bolden / Boulden  
At: ~~South Bay CF~~ South Bay CF  
600 U.S. Hwy 27 South  
South Bay, FL 33493

4.) Secretary Walter A McNeil  
Florida Dept of Corrections  
2601 Blair Stone Rd  
Tallahassee, Florida 32399-2500

# **EXHIBIT - A**

10-1161

STATE OF FLORIDA  
DEPARTMENT OF CORRECTIONS

RECEIVED

REQUEST FOR ADMINISTRATIVE REMEDY OR APPEAL

OCT 01 2010

TO  Warden  Assistant Warden  Secretary, Florida Department of Corrections **GRIEVANCE COORDINATOR**

From: Curtis, James T 166314 South Bay CF  
Last First Middle Initial Number Institution

MEDICAL GRIEVANCE Part A - Inmate Grievance MEDICAL GRIEVANCE

I'm grieving the misconduct of Dentist Mamatha Veeramachaneni and dental Asst Bolden. On 9-22-10 the dentist pulled my tooth. She pulled it because its the cheapest fix for the problem. The dentist told me if I was on the street my tooth could be saved by a Root Canal, but that she doesnt do root canals. So my only option to stop my severe pain and suffering was to allow the tooth to be pulled. Its got to be noted that the original injury to my tooth was I bit down on a rock found in my basin on my food tray. The dentist wouldnt check my bottom and top molar teeth on my left side as she said the policy is only one tooth or problem at a time per visit can be looked at no matter how many teeth are bothering me. The gums around the tooth were very red, bleeding and had infection. Anyway the tooth was pulled on 9-22-10 and it was one of the teeth that was bothering me. I've been at this facility

9-28-10  
DATE

James Curtis 166314  
SIGNATURE OF GRIEVANT AND D.C.

(Continued)

\*BY SIGNATURE, INMATE AGREES TO THE FOLLOWING # OF 30-DAY EXTENSIONS: 01 NONE  
# Signature

PART B - RESPONSE

SIGNATURE AND TYPED OR PRINTED NAME OF EMPLOYEE RESPONDING SIGNATURE OF WARDEN, ASST. WARDEN, OR SECRETARY'S REPRESENTATIVE DATE

continued 1 of 3

Since August 2009 and I never saw the dentist or dental upon arrival as you normally do upon arriving at a new facility. I never got any dental plan done and never got a callout to see dental until July 2010 almost a year later. At that visit I ~~was~~ told this dentist about my teeth problems and how they caused me severe pain daily. She told me there are over SIXTEEN hundred inmates on this Compound with only one full time dentist. She said the waiting list for dental services is over a year long and now even closer to two years long. Thus because I have less than two years left on my Sentence I wouldn't see dental to get any work done. The tooth was pulled and the dentist broke the bone around my tooth and other teeth. The dentist told me she was going to leave it alone to see if it would heal back together. It hasn't and the bones are sticking into my gums which is very painful and stopping the healing process. The tooth behind the tooth pulled which was one of the original teeth injured has what looks like a cavity. The tooth hurts and any pressure on it causes even more pain. It's the only upper left molar tooth I got left. The problem is only getting worse. The dentist wouldn't even look at the tooth when she pulled the other tooth to treat it all at once. Now the hole from the tooth pulled hasn't healed and I have an open sore/hole that goes all the way through my sinus. My sinus drains into my mouth which is a yellowish green with blood in it. I can push water through the hole out my nose. The hole traps food and drinks causing more pain and swelling and it appears to be infected. There are pieces of the broken bone sticking into and out of my gums and it can not heal as it keeps the sore opened. The pain and suffering is unbearable and only getting worse. So on 9-28-10 I went to dental sickcall. The dentist nor assistant would do any exam and when I told them what was going on they said it was all normal. I told them I didn't agree and I was in severe pain and suffering with my condition only getting worse. The dentist told me to use the pain meds from the dorm which you can only get every six hours providing staff will give them to you and if they have any. It's only about 200 to 300 mgs and that's

STATE OF FLORIDA  
DEPARTMENT OF CORRECTIONS

RECEIVED

REQUEST FOR ADMINISTRATIVE REMEDY OR APPEAL

OCT 18 2010

TO:  Warden  Assistant Warden

Secretary, Florida Department of Corrections  
INMATE GRIEVANCES

From: Curtis, James T  
Last First Middle Initial

166314  
Number

South Bay, CF  
Institution

1010 32914

Part A - Inmate Grievance

I now Appeal my dental grievance given Log# 10-1161. Now I never received any check cleaning on 9-22-10. Then on 9-22-10 my tooth was pulled as it was my only option as the dentist wouldn't do the root canal which she said could save the tooth. At no time does any X-Ray show any fracture in the tooth that was pulled on 9-22-10. The dentist only states this now because I grieved that was my only option per her that I was given and its her policy to pull teeth as its easier and cheaper. She now denies that allegation. I only signed the consent because it was my only option to try and stop my tooth pain that was severe. The dentist admits she broke the bone around my tooth. But its not minor its serious and caused severe pain and now caused a very painful deformity with bones sticking up under the gum which cause pain and its like a big hole in my jaw where bone is suppose to be and its bleeding. So there is severe bone defect now that dental went look at. The dentist admits that on 9-22-10

10-12-10  
DATE

- Continued -

James Curtis 166314  
SIGNATURE OF GRIEVANT AND D.C. #

\*BY SIGNATURE, INMATE AGREES TO THE FOLLOWING # OF 30-DAY EXTENSIONS: 01 NONE  
# Signature

PART B - RESPONSE

SEE ATTACHED  
RESPONSE

SIGNATURE AND TYPED OR PRINTED NAME  
OF EMPLOYEE RESPONDING

SIGNATURE OF ASSISTANT WARDEN, OR  
SECRETARY'S REPRESENTATIVE

DATE

Continued 1 of 2

I went to dental sickcall with complaints of pain. And they were severe as I stated in the grievance. She admits to knowing I told her of the draining which was a yellowish green puss with blood. I had a hole all the way through my sinus cavity where air can still be blown through. At no time in her response does she state she or anyone did any examination of my mouth on 9-28-10. As there never was one done period. She states I was told I would get a follow up visit with dental 2 weeks post extraction. She never told me that and still to date I've never received the follow up visit. She said my pain would be addressed. But she did was listen to me and tell me to get pain meds from the dorm even when I told her it was small amount every six hours if staff will provide it. She gave me no pain meds or meds for my infection on 9-28-10 or since that date. She knowingly left me to suffer in severe pain when she could have done something. She admits her solution was to give it time. She also admits I was upset because she wouldn't do anything for me and I was in severe pain + suffering. Now she states I left dental when really her and Asst. Kicked me out of dental for stating I would grieve the matter. It would make no sense to go to sickcall wait to see dentist and then just get upset and walk out with the dental problems she admits I had and the pain I was having. They kicked me out and told me not to return and they never had the follow up because she doesn't want me at dental period. She never addresses why she didn't fix the cavity behinds tooth pulled or why she will only address one tooth at a time per visit to sickcall. She never addressed why I never saw dental when I arrived at South Bay in August 2009 but had to wait until July 2010. And as for the one to two year long waiting list she states first come first serve with over Eighteen hundred inmates on compound. There is only one full time dentist for the compound. She down plays what took place because she knows she is wrong and she said the grievance wouldn't do me any good as she would respond to it which she did. She never addresses the reprisal she threatened and has requested I be transferred which I spoke to my classification officer about today. Which she stated I could get snatched up at any time. And because I've grieved medical and dental so much and wrote to state agencies and sent Notice of Intent to Sue it makes it look like I'm having too many problems here so I could get transferred

Continued 2 of 2

and if it took place it wouldn't be retaliatory. But that's exactly what it would be as it would be due to my grievance, letters to State Governmental Agencies and Notice of Intent. The dentist is good friends with Mr. Haslem and other classification staff. She stated about guys not staying here who write to many grievance. So now because of my complaints I'm subjected to a retaliatory transfer and loose out on my Vocational Computers Class I just started that's a year long and at no other facility is it offered. I have no disciplinary problems period here. My complaints on medical and dental are serious problems that needed to be addressed. But now in a point if I want to stay here I got to drop this whole matter and go along with it or be subject to retaliatory transfer.

Remedy Sought To provide me needed dental care I need and to stop all forms of reprisal because of my grievance and letters to State Agencies as they are wrote in truth and good faith. I'm still in pain and still no follow up done. If they would fix the problems it would be resolved.

James [Signature]  
1106314

10-12-10

STATE OF FLORIDA  
DEPARTMENT OF CORRECTIONS

REQUEST FOR ADMINISTRATIVE REMEDY OR APPEAL

**RECEIVED**

TO:  Warden  Assistant Warden  Secretary, Florida Department of Corrections **OCT 05 2010**

From: Curtis, James T 166314 **GRIEVANCE COORDINATOR**  
Last First Middle Initial Number Institution

Part A - Inmate Grievance

This is a grievance of Reprisal against Dentist Veeramachaneni and dental Asst. Borden or Bouden here at South Bay CE. On 9-28-10 I went back to dental sickcall because I had a tooth pulled that the hole wasn't healing it was infected, bleeding, Red, Swollen, hurting and went through my sinus cavity. Plus she broke the bone around the teeth causing sharp edges sticking into my gums causing pain. I couldn't chew and food was getting stuck in hole. They wouldn't do any examination and told me it was normal. I said it wasn't normal and I was going to grieve it. That upset them and they ordered me to have dental and they weren't doing anything for me. Also not to return to dental period basically. Now these two dental staff retaliated because I said I was going to grieve the issue on them. Now they are trying to get me transferred, false disciplinary reports which is common practice at this facility. Staff are known for their retaliatory actions against inmates who write grievance and file legal actions. I filed my Notice of Intent to Sue and did an Amended Motion for Intent to Sue. Because I'm forced to because dental won't provide needed care and keeps retaliating against me.

Remedy Sought To have all forms of Reprisal Investigated and Stopped. Regional Director Marta Villacorte called MR. Wilson about the reprisal as well as ~~was~~ MR. Weber from private Prison Monitoring about medical staff reprisal for use of the grievance process.

10-4-10  
DATE

[Signature] 166314  
SIGNATURE OF GRIEVANT AND D.C. #  
A2-2100

\*BY SIGNATURE, INMATE AGREES TO THE FOLLOWING # OF 30-DAY EXTENSIONS: 01 NONE  
# Signature

PART B - RESPONSE

Curtis, James

166314

10-1165

SBCF

A2-210U

INMATE

NUMBER

GRIEVANCE LOG NUMBER

CURRENT INMATE LOCATION

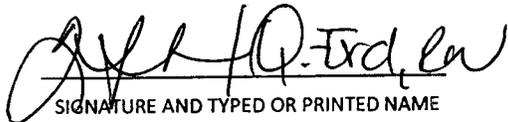
HOUSING LOCATION

YOUR REQUEST FOR ADMINISTRATIVE REMEDY OR APPEAL HAS BEEN RECEIVED AND REVIEWED.

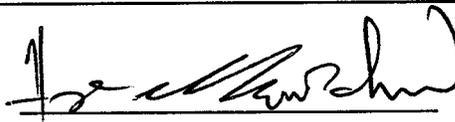
YOUR GRIEVANCE IS BEING RETURNED UNPROCESSED IN ACCORDANCE WITH 33-103.014 (1) (N) WHICH STATES A DECISION HAS ALREADY BEEN RENDERED TO AN INMATE BY A PARTICULAR OFFICE ON THE ISSUE CURRENTLY BEING GRIEVED BEFORE IT. SEE FORMAL GRIEVANCE LOG #10-1161

YOU MAY OBTAIN FURTHER ADMINISTRATIVE REVIEW OF YOUR COMPLAINT BY OBTAINING FORM DC1-303, COMPLETING THE FORM, PROVIDING ATTACHMENTS AS REQUIRED BY 33-103.007 AND FORWARDING TO THE OFFICE OF INMATE GRIEVANCE APPEALS, 2601 BLAIRSTONE ROAD, TALLAHASSEE, FLORIDA 32399-2500.

Q. Ford, M.S.N., B.S.N., R.N.

  
SIGNATURE AND TYPED OR PRINTED NAME

OF EMPLOYEE RESPONDING



SIGNATURE OF WARDEN, ASST. WARDEN, OR

SECRETARY'S REPRESENTATIVE

  
DATE

COPY DISTRIBUTION - INSTITUTION / FACILITY

(2 Copies) Inmate

(1 copy) Inmate's File

(1 Copy) Retained by Official Responding

COPY DISTRIBUTION - CENTRAL OFFICE

(1 Copy) Inmate

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(1 Copy) C.O. Inmate File

(1 Copy) Retained by Official Responding

10-0323

STATE OF FLORIDA  
DEPARTMENT OF CORRECTIONS

REQUEST FOR ADMINISTRATIVE REMEDY OR APPEAL

NOV 01 2010

TO:  Warden  Assistant Warden  Secretary, Florida Department of Corrections

From: Curtis, James T 166314 South Bay CF  
Last First Middle Initial Number Institution  
10-10-34451

Part A - Inmate Grievance

I'm Appealing my grievance of Reprisal responded to by Nurse Q. Ford who returned my grievance and she cannot respond to a Grievance of Reprisal, but only the Warden can per 33-103.002(15)(d)(1), 33-103.006(3) and 33-103.015(3). Also grievance Log # 10-1161 was a medical grievance and not a Reprisal grievance. Now per 33-208.002(1) Ms. Ford and the Asst. Warden are suppose to know and follow the F.A.C. Chp-33 Rules. This was not done clearly by the Signature and typed name of the Responder. Because clearly she is an RN from medical not Warden Lewis. And the Rules cited above make it clear that only the Warden can make the decision to Approve, Return, or Deny a grievance of Reprisal. (Remedy sought) For this office to follow chp-33 Rules and return my grievance of Reprisal to Warden Lewis for proper handling and response according to chp-33 Rules.

10-27-10  
DATE

James T 166314  
SIGNATURE OF GRIEVANT AND D.C. #

\*BY SIGNATURE, INMATE AGREES TO THE FOLLOWING # OF 30-DAY EXTENSIONS: 01 NONE  
# Signature

PART B - RESPONSE

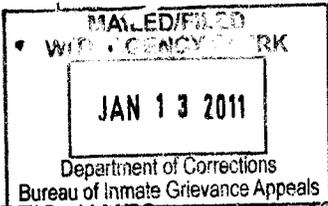
SEE ATTACHED  
RESPONSE

405  
07B  
10-11-10 A2-2100

SIGNATURE AND TYPED OR PRINTED NAME  
OF EMPLOYEE RESPONDING

SIGNATURE OF WARDEN, ASST. WARDEN, OR  
SECRETARY'S REPRESENTATIVE

DATE



**PART B - RESPONSE**

<u>CURTIS, JAMES</u>	<u>166314</u>	<u>10-6-34451</u>	<u>SOUTH BAY C.F.</u>	<u>A2210U</u>
INMATE	NUMBER	GRIEVANCE LOG NUMBER	CURRENT INMATE LOCATION	HOUSING LOCATION

Appeal Denied:

Your request for administrative remedy was received at this office and it was carefully evaluated. Records available to this office were also reviewed.

In addition, the institution was contacted and they provided this office with information regarding the issues you presented.

The Director of Dental Services, Dr. Shields also reviewed your appeal.

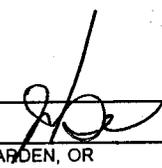
It is determined that the response made to you by Dr. Veeramachaneni on formal response #10-1161 appropriately addresses the issues you presented.

It is the responsibility of the Dentist to determine the appropriate treatment regimen for the condition you are experiencing.

Should you experience problems, sick call is available so that you may present your concerns to your health care staff.

**CONFIDENTIAL HEALTH RECORD/CARE INFORMATION INTENDED FOR ADDRESSEE(S) ONLY.  
UNAUTHORIZED RELEASE OR DISCLOSURE MAY VIOLATE STATE AND FEDERAL LAW.**

Pilar Tournay II SC

		
SIGNATURE AND TYPED OR PRINTED NAME OF EMPLOYEE RESPONDING	SIGNATURE OF WARDEN, ASST. WARDEN, OR SECRETARY'S REPRESENTATIVE	DATE

**COPY DISTRIBUTION - INSTITUTION / FACILITY**  
 (2 Copies) Inmate  
 (1 Copy) Inmate's File  
 (1 Copy) Retained by Official Responding

**COPY DISTRIBUTION - CENTRAL OFFICE**  
 (1 Copy) Inmate  
 (1 Copy) Inmate's File - Inst./Facility  
 (1 Copy) C.O. Inmate File  
 (1 Copy) Retained by Official Responding

# **EXHIBIT - C**

10-1170 - Dr. Veeramachandran

STATE OF FLORIDA  
DEPARTMENT OF CORRECTIONS

REQUEST FOR ADMINISTRATIVE REMEDY OR

**RECEIVED**

TO:  Warden  Assistant Warden  Secretary, Florida Department of Corrections

OCT 6 2010

From: Curtis, James T 166314  
Last First Middle Initial Number

South Bay CF  
**GRIEVANCE COORDINATOR**  
Institution

Part A - Inmate Grievance

This is a medical grievance against Dentist Veeramachandran and her refusal to provide needed dental care. On 9-22-10 I had a tooth pulled. The dentist broke bone around my teeth. The hole where the tooth was pulled still hasn't healed. I got bones sticking into my gums and it's been over two weeks. On 9-28-10 went to dental sickcall dentist and Asst. wouldn't do anything for me said I would grieve it so they kicked me out of dental and told me not to return. I believe I have or had a osteitis, localized alveolar or know as dry socket. This goes into my sinus cavity and my sinuses drain down through it. It looks infected and is still Red, Swollen, and very painful. And its still not healing properly. Its been two weeks plus now.

Remedy Sought: To stop all forms of reprisal by these dental staff and all staff. I have serious dental conditions that are still hurting and getting worse after 2 week plus. This is not normal and inhuman treatment by not allowing me to use the dental sickcall because I said I would write dental staff up for their misconduct. Also dental staff are trying to get me transferred because of my grievances routine plus my Notice of Intent To Sue that they got by mail because they want provide treatment. Its been two weeks so it proves and shows retaliation and deliberate indifference.

*James T Curtis*  
166314

10-6-10  
DATE

*James T Curtis* 166314  
SIGNATURE OF GRIEVANT AND D.C. #

\*BY SIGNATURE, INMATE AGREES TO THE FOLLOWING # OF 30-DAY EXTENSIONS: 0 NONE  
# Signature

PART B - RESPONSE

Curtis, James

166314

10-1170

SBCF

A2-210U

INMATE

NUMBER

GRIEVANCE LOG NUMBER

CURRENT INMATE LOCATION

HOUSING LOCATION

YOUR REQUEST FOR ADMINISTRATIVE REMEDY OR APPEAL HAS BEEN RECEIVED AND REVIEWED.

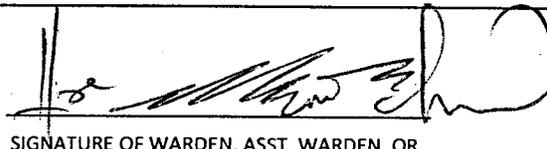
YOUR GRIEVANCE IS BEING RETURNED UNPROCESSED IN ACCORDANCE WITH 33-103.014 (1) (N) WHICH STATES A DECISION HAS ALREADY BEEN RENDERED TO AN INMATE BY A PARTICULAR OFFICE ON THE ISSUE CURRENTLY BEING GRIEVED BEFORE IT. SEE FORMAL GRIEVANCE LOG #10-1161

YOU MAY OBTAIN FURTHER ADMINISTRATIVE REVIEW OF YOUR COMPLAINT BY OBTAINING FORM DC1-303, COMPLETING THE FORM, PROVIDING ATTACHMENTS AS REQUIRED BY 33-103.007 AND FORWARDING TO THE OFFICE OF INMATE GRIEVANCE APPEALS, 2601 BLAIRSTONE ROAD, TALLAHASSEE, FLORIDA 32399-2500.

Q. Ford, M.S.N., B.S.N, R.N

 Q. Ford, M.S.N., B.S.N, R.N

SIGNATURE AND TYPED OR PRINTED NAME  
OF EMPLOYEE RESPONDING



SIGNATURE OF WARDEN, ASST. WARDEN, OR  
SECRETARY'S REPRESENTATIVE

10/8/10  
DATE

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(2 Copies) Inmate

(1 copy) Inmate's File

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COPY DISTRIBUTION - CENTRAL OFFICE

(1 Copy) Inmate

(1 Copy) Inmate's File - Inst./Facility

(1 Copy) C.O. Inmate File

(1 Copy) Retained by Official Responding

STATE OF FLORIDA  
DEPARTMENT OF CORRECTIONS

10-0304

REQUEST FOR ADMINISTRATIVE REMEDY OR APPEAL

RECEIVED  
OCT 18 2010  
DEPARTMENT OF CORRECTIONS  
INMATE GRIEVANCES

TO:  Warden  Assistant Warden

Secretary, Florida Department of Corrections

From: CURTIS, JAMES T  
Last First Middle Initial

166314  
Number

SBCF  
Institution  
10-6-32976

Part A - Inmate Grievance

I'm Appealing the Response to my medical Grievance Log# 10-1170 against dental. Now the responder states it was already answered in medical grievance Log# 10-1161 But that's not true as the grievance 10-1170 is a grievance filed on 10-6-10 about how my dental problems still weren't being addressed by dental and how I couldn't go to dental. So this grievance is separate and about how I still got no treatment about eight days later and my conditions got worse.

Remedy Sought: To have dental deal with my dental problems and stop all forms of reprisal they are doing to include not allowing me back to dental. And make them respond to this grievance as it's not already been answered or addressed.

10-12-10  
DATE

James Curtis 166314  
SIGNATURE OF GRIEVANT AND D.C. #

\*BY SIGNATURE, INMATE AGREES TO THE FOLLOWING # OF 30-DAY EXTENSIONS: 01 NONE  
# Signature

PART B - RESPONSE

SEE ATTACHED  
RESPONSE

405  
07B  
10-1170  
DATE

SIGNATURE AND TYPED OR PRINTED NAME  
OF EMPLOYEE RESPONDING

SIGNATURE OF WARDEN, ASST. WARDEN, OR  
SECRETARY'S REPRESENTATIVE

10-2104

RECEIVED  
WITH AGENCY  
APR 12 2011  
Department of Corrections  
Bureau of Inmate Grievance Appeals

PART B - RESPONSE

CURTIS, JAMES                      166314                      10-6-32976                      SOUTH BAY C.F.                      A2210J  
INMATE                      NUMBER                      GRIEVANCE LOG NUMBER                      CURRENT INMATE LOCATION                      HOUSING LOCATION

Appeal Denied:

Your request for administrative remedy was received at this office and it was carefully evaluated. Records available to this office were also reviewed.

In addition, the institution was contacted and they provided this office with information regarding the issues you presented.

It is determined that the response made to you by Dr. Veeramachaneni on formal response #10-1161 appropriately addresses the issues you presented.

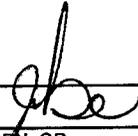
It is the responsibility of the Dentist to determine the appropriate treatment regimen for the condition you are experiencing.

Should you experience problems, sick call is available so that you may present your concerns to your health care staff.

CONFIDENTIAL HEALTH RECORD/CARE INFORMATION INTENDED FOR ADDRESSEE(S) ONLY.  
UNAUTHORIZED RELEASE OR DISCLOSURE MAY VIOLATE STATE AND FEDERAL LAW.

Pilar Tournay IISC

  
SIGNATURE AND TYPED OR PRINTED NAME  
OF EMPLOYEE RESPONDING

  
SIGNATURE OF WARDEN, ASST. WARDEN, OR  
SECRETARY'S REPRESENTATIVE

4/8/11  
DATE

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# **EXHIBIT - D**

