

While Mr. Ellis's death is of course sad and unfortunate, it was not caused by any action or inaction of the Sheriff in his official capacity. He died of sepsis which is an infection of the blood and which is very difficult to diagnose, which develops rapidly, and is often fatal. Mr. Ellis's medical expert has acknowledged this much as well. At the time of Mr. Ellis's incarceration, the Jail employed a full-time nurse and contracted with a PA who visited the Jail regularly; collectively they provided medical care to the inmates in the Jail. Prior to Mr. Ellis's death, there was no indication that the nurse or the PA's medical care was concerning or lacking in any respects. The video depicts behavior by Jail staff that had never before been seen, heard, or reported up the chain in the Sheriff's Office, prior to Mr. Ellis's death. Certain Jail staff's interactions with Mr. Ellis were contrary to their training and to Jail policies and procedures. The video does NOT accurately depict the Sheriff's Office's policies, procedures, standards, or expectations of Jail staff. To this end, I have filed a Motion for Summary Judgment on behalf of the Sheriff in his official capacity asking that the Court dismiss the Sheriff in his official capacity from this case and am hopeful that it will be granted.