## FLANAGAN, UNGER, GROVER & McCOOL

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Leroy D. Baca, Sheriff Los Angeles County Sheriff's Department 4700 Ramona Blvd. Monterey Park, CA 91754

Captain Ralph G. Ornelas Men's Central Jail 441 Bauchet Street Los Angeles, California 90012

Dear Sheriff Baca and Captain Ornelas:

The purpose of this communication is to inform you that Conrad R. Murray, booking number 2926725, who is currently housed in Men's Central Jail, has suffered injury as a result of his extremely limited access to exercise. For the last year, Dr. Murray who is 6'5" tall, has been confined in a 5' by 7' cell which essentially provides him with no opportunity for physical movement throughout the day. The only actual exercise that Dr. Murray receives occurs on most Monday evenings when he is transferred in chains to an 8' by 8' cage on the roof of the facility.

As a result of the severe limitation of physical movement, Dr. Murray is experiencing, for the first time, the following problems:

- 1. Marked venous stasis of his lower extremities.
- 2. Right shoulder pain and severe loss of motion.

The venous stasis gives rise to a high risk for deep vein thrombosis and/or migrating pulmonary embolism. This condition may have developed to a chronic state which has become permanent and uncorrectable necessitating a lifetime of medication and treatment.

Dr. Murray acknowledges that his notoriety may involve the necessity for isolation for his safety. Death or injury at the hands of another prisoner however, is no worse than a slow death caused by a loss of circulation and atrophy resulting from inhumane confinement of a large man in a tiny space.

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It is understood that the logistics of realignment pursuant to Penal Code Section 1170 (h) and protective care, make it difficult for the Sheriff's Department to provide adequate and humane housing in view of the limitation of the facility for long term incarceration. Nevertheless, there are alternatives available to protect society and punish offenders that would not likely result in causing permanent injury or death to an inmate.

A review of earlier booking photos and bio-statistics of Dr. Murray, when compared to his current condition and appearance, would be shocking to persons not previously familiar with him. To those who have known him for the last year or longer, the suffering that has obviously taken its toll on his health is unimaginable.

It is difficult for a man of ordinary stature to be confined to a 5' by 7' space for all of but two and a half hours each week. Dr. Murray's cell is proportional to that of a travel cage used for short term transportation of an animal. If one were to keep a dog in a space just a few inches larger than the dog's length, for any extended period of time, contentions of animal cruelty possibly leading to prosecution would likely result. Knowingly subjecting a human to such conditions would at the very least give rise to civil liability for negligent confinement resulting in a debilitating medical condition.

Please consider this letter as notice of the life threatening condition in which Dr. Murray currently exists. Correction of this intolerable situation is of extreme importance.

Very truly yours,

FLANAGAN, UNGER & GROVER

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Attorney for Conrad Murray

LAW OFFICES OF VALERIE G. WASS

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