Prisoner Access to the Court and Adequate Law Library

Nine Recommendations for System Improvement
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Executive Summary

The John Howard Association of Illinois (JHA) is the State’s only prison watchdog; we are a nonprofit, nonpartisan, independent organization that monitors correctional facilities, policies and practices, and advances reforms needed to achieve a fair, humane and effective criminal justice system.

We are not part of the government and receive no governmental funding. JHA is a citizen monitoring entity that visits correctional facilities; receives and responds to privileged mail from people incarcerated in Illinois; maintains open lines of communication regarding custodial conditions with other interested parties such as loved ones, people who work in corrections, legislators, and other concerned citizens; and supports constructive change.

Over the past two years, JHA has corresponded with thousands of people incarcerated within the Illinois Department of Corrections (IDOC) and visited IDOC prisons of all security classifications, collecting more than 20,000 surveys from people who live and work at these facilities, as well as observing conditions, speaking with people, and reviewing facility specific information. From this work, it is apparent that access to law libraries and legal information, and hence to courts, is an area of concern.

This report memorializes of our findings and presents recommendations for our state to better meet the needs and constitutional rights of people who are incarcerated in Illinois.
Access to prison law libraries is a pressing, chronic issue

Through survey responses, individual correspondence and in conversations during JHA prison visits, people who are incarcerated frequently report to JHA that they do not have adequate access to the prison law library, which for many who do not have legal representation is the foundational step to accessing courts.

JHA survey data demonstrates concerns regarding law library access across most facilities with thousands of incarcerated respondents reporting inadequate access.¹ People report both difficulty getting to the law library and inadequate time or resources within the library when they are able to go. Law library access is also one of the most concerning commonly reported issues JHA’s Prison Response Unit (PRU) has recorded. JHA often hears from people who are

71% of JHA 2018 survey respondents housed in IDOC’s male maximum security prisons reported that they did not have adequate law library access.

¹ Survey results suggest that people housed in maximum security prisons may be most underserved by their prison’s law library. As one man recently wrote, “I’m an inmate at Stateville CC, and I’m sure you’ve received thousands of letters probably, about how inadequate the law library is at this facility.” Of the those housed in IDOC’s three male maximum-security prisons (Menard, Pontiac, and Stateville) who completed a JHA 2018 survey, 71% indicated they strongly disagreed or disagreed with the statement “I have adequate access to the law library.” In comparison, 31% of respondents housed in minimum, medium, and mixed security prisons responded similarly to the same statement. Maximum security prisons mostly house people serving long sentences for serious criminal offenses. Given the amount of time people housed in maximum security prisons are facing and the harsh conditions in which they live, these prisoners may be more likely to pursue legal action seeking to have their convictions overturned or their sentences modified by the courts. In addition, although people incarcerated throughout IDOC file a multitude of complaints in federal court regarding conditions of confinement they are subjected to alleging violations of their federal constitutional or statutory rights, it also appears that most of these complaints originate from maximum security prisons. JHA has observed nearly twice the demand for PRU legal informational services from the male maximum security IDOC facilities. During 2018, of the 3,794 requests of these requests that JHA received and fulfilled, 2,573 (67.8%) were made by people housed in maximum security prisons. Of the 2,392 requests for print outs of court decisions JHA fulfilled in 2018, 1,776 (74.2%) were made by people housed in maximum security prisons. Additional JHA PRU and survey data can be found at www.thejha.org.
incarcerated that lack of access to the prison law library impacts their ability to advocate for themselves by completing time sensitive legal filings in time to be considered.

For example, some typical reports include:

*The IDOC makes it impossible to intelligently defend yourself. Lockdowns and court writ transfers make it impossible to gain meaningful access to a law library, conduct research, and meet the courts pressing deadlines.*

*In my law library, I get only 15 minutes to research cases because there is only one [Lexis enabled computer research] kiosk and there are too many people who sign up and the machine likes to freeze all the time. I think this is preventing me from receiving access to the courts. The books are outdated and IDOC I believe is trying to block Lexis from being accessed.*

*I am not able to acquire copies of case law in a timely manner because of a policy that this institution has formulated which prevents me from accessing the law library when I need to do so. That being the case, I am prevented from doing the necessary legal research I need to do, which, in turn, prevents me from preparing legal arguments so I may file my pleadings in an effective manner.*

*I am a pro se litigant dealing with criminal law. We only get to go to the law library twice a month for an hour. And that’s not enough time to adequately research, type, and prepare to fight your case. At this rate, it’s impossible to fight your case adequately and go home under these conditions.*

Lack of access to the law library and thereby to courts can be one of biggest stressors for people who are incarcerated; as one person dramatically wrote of Pontiac Correctional Center, a long-term segregation, maximum-security prison: “Everything is bad here, especially law library.”
Moreover, prisoners often report they cannot afford what they may be charged for copies of materials,\(^2\) while they will not typically have time to read the materials and take notes during their limited time in the library.

Representative quotes include:

*I don’t have the money to pay for these cases from the law library – and you get very little help – and very little time (when) you get called to go.*

*Each month IDOC takes my whole state-pay and applies it to the legal library debt I now owe. I’m currently $1,400 plus in debt to [the facility’s] Legal Library for my necessary legal copies and mail.*

Based on the volume and nature of requests for legal materials JHA receives, most people are not provided with enough time to identify and obtain relevant court decisions, let alone conduct meaningful legal analyses of these decisions or other legal materials.

In 2015, given an increase in mail we received and other complaints about access to law libraries, supported by observations on visits, JHA’s Prison Response Unit began filling gaps in services IDOC should have been providing by mailing legal materials to prisoners upon request. Over the last four years the number of requests for legal materials JHA received grew several times over. Regularly people who are incarcerated express that if not for JHA, they would not be able to obtain these materials. Of concern is that some IDOC staff routinely referred people to JHA knowing that we would fulfill people’s research needs in a more expedient manner than the facility law library. For one example, a man wrote, “I visited the prison library and was referred to contact your Association, being that the library’s Post-Conviction Remedy Example book was stolen.”

\(^2\) Usually people are charged ten cents a page if they are not considered “indigent,” which may mean that a prisoner may have as little as $20 within a month period; however, there are some facility-based variations.
JHA recognizes the importance of people having access to the legal materials they need to mount effective criminal appeals and challenge unconstitutional conditions of confinement in the courts, which is why we have done our best with what little resources and volunteer network we have to help. However, JHA is not resourced and has never been resourced to meet this demand. Until July 2019, we continued to provide requested documents in order to support prisoners’ rights; however, due to ongoing lack of funds and inability to gain funding for this effort, it is no longer possible for us to do this.

What is legally required?

The legal standard for prison law libraries is nebulous at best. The United States Supreme Court held that “the fundamental constitutional right of access to the courts requires prison authorities to assist inmates in the preparation and filing of meaningful legal papers by providing prisoners with adequate law libraries or adequate assistance from persons trained in the law.” *Bounds v. Smith*, 430 U.S. 817 (1977).

However, the *Bounds* Court did not establish that access to a prison law library is a constitutional right in and of itself, but rather, it posited that a prison law library is but one of several ways a prisoner’s constitutional right to access the courts may be satisfied.\(^3\) Nor did the *Bounds* Court articulate what an “adequate” prison law library is, and subsequent court decisions addressing individual claims concerning law library access also fail to establish a discernable universal standard as to how much access is adequate. Pertinent to IDOC, the U.S. 7th Circuit Court of Appeals held that prisoners do not have a right to “total or unlimited access,” noting that “[s]ecurity reasons … may justify strict time, place, and manner restrictions.” *Brooks v. Buscher*, 62 F.3d 176, (7th Cir. 1995). The *Brooks* court further declared that “inconvenient or highly restrictive regulations may be entirely appropriate and not violate a prisoner’s constitutional right of access, as long as the restrictions do not actually completely deny meaningful access to the courts.”

To prevail before a court when presenting a claim of inadequate law library access as a violation of the constitutional right to access the courts, a prisoner must demonstrate that limited access to the law library created an actual harm of not being able to present a valid legal claim before a court in a timely manner. This is a high bar. Paradoxically, it may be impossible for a prisoner to pursue a claim that a legitimate legal

\(^3\) *See e.g.*, Abel, Jonathan. “Ineffective Assistance of Library: The Failings and the Future of Prison Law Libraries.” *Georgetown Law Journal*. 101 Geo. L.J. 1171. June 2013. An exhaustive legal analysis of court rulings related to adequate law library access for prisoner is beyond the scope of this document. For further information on this subject, we recommend “Chapter 3: Your Right to Learn the Law and Go to Court” of the *A Jailhouse Lawyer’s Manual*, 11th ed. written and updated by members of the Columbia Human Rights Law Review, as well as the aforementioned article.
action was stymied by inadequate law library access unless the person is provided with enough time in the law library to construct legal pleadings and conduct legal research to support this claim.

Illinois law states that “the Department [IDOC] shall provide every committed person with access to ... a library of legal materials.” 730 ILCS 5/3-7-2. Similar to the courts, the Illinois legislature declared that prisoners should have access to a law library but failed to define what that access requires and left it to the Agency. There are pros and cons to the legislature not constructing statutes that prescribe specific rules for Agency policies that impact IDOC prisons, as each prison is different and specific knowledge of prison operations is important to defining the terms and setting the parameters of these policies. On the one hand, this flexibility allows IDOC to create rules for law library access that are appropriate for a particular prison or group of prisons that fall within a security class. On the other hand, however, the ambiguity in the statute makes it so there is no legal backstop guaranteeing a minimum amount of access or access to particular materials.

Notably, as scholars have observed, “[i]n the 1970s and 1980s, prison law libraries spread throughout the country even though no one believed they were effective at providing access to the courts.”4 A model prison law library is a useless tool for someone who does not know how to wield it properly. Legal research and writing are time-consuming, difficult endeavors for experienced attorneys who have modern legal research tools readily available to them. Many prisoners face the dual hurdles of lacking legal expertise or education and having limited time if they are fortunate to get law library access, e.g. to one and half hours a week, with limited legal resources. Even an hour and a half in the law library likely does not provide the time required to complete complex tasks of effectively conducting legal research and constructing pleadings (often without corresponding official forms)5 which convey a viable legal claim or compelling legal argument and do not run afoul of the complex rules for pleadings set by the courts. For many, the time limitations are not the sole issue; without help and guidance from properly trained law librarians or paralegals drafting such documents is not possible, which limits prisoners’ access to the courts and ability to advocate for their rights.

Again, the holding of the Bounds Court was that prisoner’s constitutional right to access the courts could be upheld by prison officials either by providing adequate law libraries or by providing adequate assistance from persons trained in the law. For the relatively small number of incarcerated people who are truly legally

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5 For example, the U.S. District Courts for the Northern, Central, and Southern Districts of Illinois have forms and instructions for section 1983 complaints tailored for incarcerated people that are readily accessible on their respective websites; such forms should be available in every prison law library.
savvy, adequate law libraries may enable them to file meaningful legal papers as the *Bounds* Court required. For most people, however, adequate legal assistance is needed.\(^6\) Providing adequate legal assistance for prisoners in conjunction with or in lieu of maintaining adequate law libraries is critically important. However, it seems most prison systems throughout the United States made the determination that it would be cheaper to satisfy the *Bounds* standard by providing law libraries rather than adequate legal assistance for prisoners.\(^7\)

JHA believes providing prisoners with adequate assistance from persons trained in the law is an important and ultimately cost-effective policy for IDOC and Illinois taxpayers, and it would greatly benefit people who are incarcerated. Legal aid for prisoners will result in more properly constructed pleadings raising valid legal claims being submitted to the court, significantly reducing the number of frivolous pleadings the courts, IDOC, and the Office of the IL Attorney General address on a regular basis. Adequate assistance from persons trained in the law would benefit people who are incarcerated by drastically increasing their ability to effectively use the courts to address legitimate condition of confinement concerns and better utilize the criminal appeals process. Prisoners commonly file legal pleadings that are found to be frivolous. To be clear, this statement does not reflect underlying legitimacy of pleadings; rather, it is an acknowledgement that many pro se pleadings are technically deficient. Frivolous as a legal term is not limited to pleadings that lack factual or legal merit. Pro se pleadings created by prisoners raising legitimate claims are often rejected by the courts without the court addressing the merits of the claim due to technical deficiencies. Technical deficiencies include, but are not limited to, lack of jurisdiction, violation of statutory deadlines, failure to articulate an actionable claim, and failure to adhere to court rules for pleadings.

Many critical settled class action lawsuits affecting IDOC began as pro se endeavors initiated by prisoners, where fortunately a court recognized a legitimate claim in pro se pleadings and later appointed counsel, or pro bono counsel stepped forward to take up these cases. We wonder how many legitimate issues have

\(^6\) JHA is aware that a prisoner may petition a court to appoint counsel and counsel is automatically appointed for criminal appeals in limited circumstances. The focus of this section is adequate legal assistance being provided to prisoners as a matter of course so that viable legal claims related to criminal and civil matters may be properly raised in initial pleadings. While JHA lauds the work of the attorneys who are appointed to represent prisoner by a court or voluntarily agrees to represent them after a legal action has been initiated by a prisoner pro se, we know the majority of people who initiate a legal proceeding from a prison never receive assistance of counsel and many legitimate claims are dismissed at the first stage review solely because the initial pleadings were technically deficient.  

gone unaddressed because courts dismissed improperly plead complaints at the first stage of review. Given what we have observed regarding logistical difficulties involving access, time, and available law library resources, as well as longstanding and ongoing issues within the facilities, there is much room for improvement. If prisoners are provided with competent legal aid, it is likely that more pleadings put before the court would be considered on the merits rather than rejected for technical deficiencies upon initial review.

We also again note that reliable and timely figures pertaining to pending litigation would be a useful tool for legislators to use in assessing appropriations needs and for IDOC to use in constructing an annual agency budget. This data should be tracked and publicly reported.

Given that legal aid services for prisoners will most likely not materialize in the foreseeable future regardless of the dire need for such services, IDOC is compelled to furnish adequate law libraries.

JHA also continues to encourage judges, lawyers, and legislators to become better informed regarding contemporary conditions in prisons. Whether or not the existing amount of access to law libraries and the assistance afforded to people who are incarcerated in IDOC is violative of their constitutional rights is ultimately a policy and legal decision to be made by both legislative and judicial branches. However, JHA believes it would be more just and efficient for IDOC to address this situation proactively to meet prisoners' need for access to legal resources and to avoid the time and expense of the standard for access being judicially determined.

**IDOC should increase access to law libraries**

It is in the best interest of people who are incarcerated, the Agency, and the State for prison officials to exceed the low threshold and minimum legal standards IDOC is required to meet. Put another way, regardless of what is legally required, providing more access is advisable. There are a few reasons for this. First, inadequate law library access hinders peoples' constitutional right to challenge their convictions and proceed in court with appeals. Second, as is the case with most programming opportunities, the ability to have greater access to the law library incentivizes good behavior and increases institutional safety by
keeping more prisoners engaged. Third, contrary to popular belief, lawsuits challenging unconstitutional conditions of confinement are at times beneficial to correctional officials.

For most people who are incarcerated, if and when they will be released from prison is a paramount concern, and many, especially those housed in maximum security prisons, view the law library as the only tool available to them to further legal efforts to revisit their conviction or sentence. Denying access to the law library diminishes peoples’ ability to access the courts, and it certainly inhibits their ability to make the most out of rare opportunities to raise issues to the courts. After the standard appellate process has been exhausted, a person's ability to bring their case before the court is very limited. However, in some cases allowing adequate access to law libraries can enable people to achieve a belated just resolution to their case, furthering society's interest in justice prevailing through the legal system and an innocent person's unquestionable interest in not being imprisoned for a crime they did not commit.

Second, allowing prisoners to engage in productive activity or programming incentivizes good behavior. Legal research and writing are challenging, time-consuming endeavors. Allowing people to engage in such tasks permits them to be using their time in a constructive manner, ameliorating one of the most destructive conditions adversely impacting people inherent in most prison environments, crushing boredom. Correctional professionals have opined to JHA that the most effective ways to incentivize good behavior amongst prisoners are to feed them well and keep them busy. Like a lot of prison programming, an argument can be made for law library access impacting positive behavior. This lines up with a longstanding position of JHA: a symbiotic relationship exists between adequate programming opportunities and safety and security.

When law library access is perceived to be inadequate, there is a danger that people will view their inability to get the time they require in the law library as IDOC denying them the chance to gain their freedom or challenge what may be unconstitutional conditions of confinement directly affecting them.

Research involving perceptions of procedural justice demonstrates that someone who believes the legal process they are or were subjected to was unfair, will develop a distrustful view of the legal system and system actors, which in turn may result in them adopting antisocial norms. Thus, an incarcerated person’s belief that they are being denied due process by IDOC restricting their access to the law library should concern prison officials, as there may be a correlation between the perception of the legitimacy of prison

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policies governing law library access and the people who enforce them, and increased incidents of discord and misconduct.

Third, litigation can benefit prison systems. Several transformative class action settlements currently affecting IDOC began as pro se complaints filed in federal court by prisoners. Such civil complaints filed by prisoners in federal court challenging the constitutionality of their conditions of confinement have, with the assistance of counsel, resulted in IDOC being able to open and operate prisons such as the Joliet Treatment Center housing prisoners with severely mental illness, and a recent settlement agreement that should improve healthcare for prisoners suffering from serious medical conditions. IDOC officials are often aware of pressing issues and would address them if they could but are denied the resources required to alleviate these issues by lawmakers, as allocating tax dollars for the care of incarcerated people is not considered politically advantageous. Simply put, litigation sometimes gets prison officials the resources they desperately need to operate a humane and effective prison system that would not otherwise be provided to them.
Recommendations

JHA’s recommendations to provide more adequate access to the courts for Illinois prisoners are as follows.

1: Expand law library hours & utilize other space

Just as some prisons have been able to expand educational programming by allowing classes to be held both during first shift (7am-3pm) and second shift (3pm-11pm), prisons with the highest demand for law library services should make the law library available during the late afternoon/early evening hours. This may require additional authorized IDOC law library staff, and some staff working staggered shifts. Increasing hours across shifts would also permit more flexibility and for law library sessions to be elongated to more than one and a half hours per session.

Secondly, as most law libraries are located in a prison’s program building, adjacent empty classrooms could be utilized during library periods as satellite law library space to enable more access. While programming space is limited in most IDOC prisons, JHA has observed that it is rare for all classrooms in a prison to be simultaneously utilized. Ideally, classroom space would be utilized by people who know what materials they need and only require time to analyze the materials, whereas space in the law library proper could be reserved for those who require more than time for reading and notetaking.

To facilitate this recommendation, IDOC should allow prisoners to submit a list of citations when requesting to go to the law library so materials can be readied in advance. This will allow people more time to analyze the materials and reduce administrative burden on law library staff.

IDOC should be able to ensure an adequate number of security staff are assigned to the program building to guarantee appropriate safety and security measures and supervision are provided and use of the satellite law library space proposed herein may be reserved for prisoners who demonstrate appropriate behavior.

2: Collaborate to create standardized court forms

We recommend that IDOC collaborate with the Administrative Office of Illinois Courts to create standardized court forms for legal pleadings to be used in state and local courts. Unlike the federal courts, state and local level courts do not have official standardized forms for use by prisoners. As a result, people who are incarcerated are often forced to construct pleadings from scratch, or use unofficial forms created by law clerks. If standardized forms are created by the courts and made
available in prisons, people would not have to navigate complex rules for pleadings that can vex licensed attorneys, thereby reducing time they use in the law library to construct pleadings.

Also, this should reduce common flaws in pleadings created by prisoners, e.g. containing more or less of the information than required for the pleading or containing formatting that does not comply with court rules. Many people spend a significant amount of time in the law library constructing flawed pleadings, and then require additional time in the law library to amend these pleadings subsequent to rejection by a court. The adoption of standardized forms for the most commonly filed pleadings and ensuring these forms are accessible within prison law libraries would ensure that court rules for pleadings are followed and make pleadings filed by prisoners easier for courts to process. Standardized forms would benefit both people who are incarcerated and the courts, so this mutually beneficial recommendation is achievable. Implementation of this recommendation would benefit IDOC, as it would alleviate demand on the scarce law library time and assistance IDOC is able to offer.

3: Ensure continuous law library staffing & proper staff training

Currently, the IDOC law library staff required qualifications often do not seem to necessarily match the skill set required to serve in this role, being at times overly ambitious, i.e. requiring a library science Master’s degree or having people serve in the role with inadequate training based on unmet need, e.g. filing the position with a security staff member in a temporary assignment because of an inability to fill the position with a librarian or paralegal. JHA recognizes that filling permanent and temporary staff vacancies within IDOC is a complex and slow administrative task for IDOC officials to accomplish. Nonetheless, when IDOC is given advance notice of a pending permanent or temporary vacancy impacting law libraries, proactive measures should be taken to the extent possible to fill pending vacancies so the position is filled to prevent gaps in services.

Law libraries should never be closed for weeks or months due to preplanned authorized absences or retirements. IDOC is in many ways hamstrung by unnecessary red tape where filling staff vacancies is concerned. Thus, this recommendation is partly directed at IDOC, but JHA recognizes that an overhaul of hiring practices is longstanding major need of IDOC that must be addressed by the executive and legislative branches of Illinois government.

Staff training remains critical for law library positions as these people control incarcerated people’s access to adequate law library resources and effective access to the courts and must make appropriate decisions to prioritize limited services and provide appropriate assistance.

4: Seek to establish external partnerships

We recommend that IDOC seek to establish partnerships with law schools, librarians, and others. Law schools located throughout Illinois would make excellent partners for prison law libraries, as students and faculty of these institutions may be willing to partner with IDOC. Also, some law schools may be interested in creating self-help manuals tailored to people housed in IDOC prisons for a variety of subjects.

For example, there is a dearth of materials available to male prisons related to family law, and no organization we know of is interested in filling this information void even though the vast majority of IDOC’s population are male and have children. This is but one of many unmet needs that may be satisfied by IDOC forming partnerships with legal clinics embedded within law schools in Illinois.

Additionally, well-resourced law firms and librarians may be interested in helping preserve rights of incarcerated people and assist in alleviating informational poverty affective prisoners. Partners could help IDOC stay up to date and better resource and audit contents of facility libraries.

5: Increase the number of capable prisoner law clerks

IDOC should establish a formal program to train prisoner law clerks. IDOC could accomplish this goal by establishing partnerships with legal clinics embedded within law schools, pro bono programs embedded within well-resourced law firms, or entities that offer paralegal training courses to create and maintain this program. If geographic barriers between possible partners and the locations of prisons is an issue use of secure technology for online trainings could be utilized or it would be possible to temporarily transfer people to prisons hosting a formal law clerk training program. As all prisoners allowed to work in a law library will be cleared by security staff, there should be no legitimate security concern arising from this recommendation that cannot be easily addressed. JHA has heard from many individuals with aptitude who are interested in learning more and assisting others.

Law library clerks perhaps should not be subject to a limit on how long a prisoner can hold one work assignment, if others have not had appropriate training. IDOC policy typically dictates that prisoners may hold a work assignment continuously for six months unless the Warden of the facility approves an extension on a case by case basis. The law library clerk assignment is unique compared to other prison
work assignments, as the ability to perform satisfactorily in this position may take months or years of development. Law clerk training is also a valuable and employable skill for people to have when leaving prison. JHA and other advocacy groups rely on former prison law clerks as invaluable employees and advisors.

6: Adequately resource law libraries

Properly trained librarians must ensure that materials required by the population are readily available. Some of our recommendations regarding materials that should be accessible are detailed in the Appendix to this report. Additionally, secure access to the internet for law library staff is at times necessary to locate information people may require that is appropriate for law library staff to provide, such as contact information for foreign consulates for use by foreign nationals, or the statutes, court forms, etc. of other jurisdictions for prisoners that have pending charges/detainers in jurisdictions out of state and those held by IDOC due to interstate compact transfers (i.e. Illinois statutory materials available in hard copy will not satisfy their research needs). Increasing availability and access of legal research kiosks may also be helpful.

JHA has received many reports that certain needed materials are missing in various IDOC law libraries, e.g. “[t]hey got rid of informative IDOC Rules which make it near impossible to write a grievance with merit,” or “[o]ur law library has thrown out all the American Law Review (ALR) books claiming mold damage.” Staff also sometimes ask us for assistance finding people to donate updated materials. However, it is impossible for JHA to continuously verify reports of inadequate resources; therefore, what materials are in each law library and the state of these materials cannot be exhaustively addressed. Rather being addressed ad hoc, as mentioned above, we recommend that law library contents be regularly reviewed and audited by well-trained staff and potentially also by library partners with resources for this endeavor. However, JHA has on visits observed several volumes of court reporters and other books within IDOC law libraries with pages torn out. While JHA recognizes that replacing a volume of a court reporter every time a person rips pages out of the book is cost prohibitive, IDOC can and should maintain legal materials in the law library. This can be achieved at little expense. For example, after discovering that pages have been ripped from a reporter, the court decision(s) that were ripped from the reporter can be replaced by printing out the missing court decision(s) and placing the print out with the book. Also, books should be regularly checked after use so that stolen materials can be retrieved and this practice diminished, which seems like a likely outcome if access to legal materials inside prisons is increased. In order to preserve high-demand books, some librarians have informed JHA that they now keep them behind the librarian's desk and a prisoner must request it. Along with this practice, it follows that people should be informed that the materials are available to them upon request.
7: Equitably prioritize & respond to requests

We recommend that IDOC ensure people are equitably prioritized for time in the law library and be required to formally respond to requests for law library. Currently prisoners are prioritized for law library based on having an imminent verifiable court date on a pending case. Prisoners facing deadlines for court must be prioritized where there is not enough law library time available to satisfy demand. However, JHA recommends that pro se litigants with active cases and those who face approaching statutory filing deadlines and have yet to file a complaint or petition should also be moved to the front of the line. Prisoners who are represented by court appointed or privately retained counsel with pending court dates should not be included prior to others with greater need and less assistance in the list of people prioritized for law library access. While JHA appreciates that people represented by a licensed attorney may wish to stay informed as to their criminal appeals and civil actions, their need for time in the law library is not as pressing as for those who are not represented by counsel. If a prisoner is represented by counsel, their attorney should consistently communicate with them concerning their case.

IDOC also should provide written responses to requests to access to the law library for those denied access by means of official IDOC letterhead or form, which would allow people who miss a filing deadline to demonstrate to the court that their late filing was not due to negligence on their part when applicable.

8: Effectively implement tablet technology

IDOC reports they will offer vendor GTL’s tablets to people in our prisons in the near future, and these tablets should include legal research capacity. GTL marketing materials state, “If a correctional facility subscribes to a law library, GTL can enable Law Library Access so that inmates can access it on a GTL Inspire® tablet.” If the tablets enabled this functionality it would alleviate the demand upon the restricted law library time available by allowing to access information outside of the law library setting. However, as JHA has yet to directly observe the GTL tablets in use with this capacity, we cannot be confident this will occur. The systemwide rollout of GTL technology has suffered prolonged delays due to a number of factors. Hence, it is premature to discuss recommendations relating to tablet access to legal resources in detail, as whether or not this technology will be broadly accessible to people incarcerated throughout IDOC is questionable and likely will depend on people’s ability to afford it, and the functionality of the technology has yet to be verified. Nonetheless, the potential usefulness of this technology is undeniable.

9: Create external prisoner legal aid for Illinois

Other jurisdictions, like Illinois in the past, have external prisoner legal aid entities that assist with prisoner litigation. Illinois should further explore if this is a sensible solution to alleviate prison law library and court access concerns.
This report was written by JHA staff. Media inquiries should be directed to JHA’s Executive Director Jennifer Vollen-Katz at (312) 291-9555 x205 or jvollen@thejha.org

People incarcerated in Illinois may send privileged mail to
JHA, P. O. Box 10042, Chicago, IL 60610-0042

Since 1901, JHA has provided public oversight of Illinois’ juvenile and adult correctional facilities. Every year, JHA staff and trained volunteers inspect prisons, jails, and detention centers throughout the state. Based on these inspections, JHA regularly issues reports that are instrumental in improving prison conditions. JHA humbly thanks everyone who graciously shared their experiences and insights with us.
Appendix

Minimum Recommended Legal Materials for IDOC Law Libraries

At a minimum, JHA recommends the following legal resources be readily available and kept updated in all IDOC libraries:

- West’s\textsuperscript{11} United States Code Annotated
- West’s Federal Rules of Evidence
- West’s Federal Rules of Civil Procedure
- Complete sets of West’s Federal Court Reporters (United States Supreme Court Reporter, Appellate Court Reporter, Federal Supplement, and Federal Appendix)
- West’s Illinois Compiled Statutes Annotated
- Complete set of West’s Illinois Decisions
- West’s Illinois Criminal Law and Procedure
- Complete set of West’s Key Digest
- Graham’s Handbook of Illinois Evidence
- Legal dictionary
- English dictionary
- Spanish/English dictionary
- Illinois Pattern Jury Instructions
- Legal encyclopedia
- Sullivan’s Law Directory
- American Law Report
- Current forms and instructions for Section 1983 Complaints for the U.S. District Courts for the Northern, Central, and Southern Districts of Illinois
- Illinois Administrative Code relevant to corrections (including, but not limited to Title 20, parts 103 through 1905)
- IDOC Administrative Directives
- The prison’s Orientation Manual

\textsuperscript{11} JHA does not endorse any publisher. However, many legal materials have proprietary digest/numbering systems that apply only to the publisher’s materials; hence, a law library requires compatible materials.
- Warden’s Bulletins
- Access to Shepard’s Digest
- Guide for legal research for beginners
- Post-Trial Remedies: A Handbook for Illinois Prisoners (Illinois State Bar Association publication)
- A self-help guide for section 1983 complaints, such as the Jailhouse Lawyer’s Handbook by the Center for Constitutional Rights and the National Lawyers Guild
- Forms for Illinois Court of Claims
- Illinois Administrative Code, Title 74: Part 790: Court of Claims Regulations
- Information regarding pending class actions of IDOC prisoners

The list above is by no means an exhaustive list of legal resources that should be found in all IDOC law libraries. It should serve as a baseline for materials that should be readily available to prisoners. There are many quality resources available online for free not listed above that would enhance the efficacy of IDOC law libraries such as the Illinois Office of the State Appellate Defender’s Cumulative Criminal Law Digest by Chapter, which provides regularly updated topical legal information for people seeking the federal and state court rulings concerning criminal appeals. Additionally, the Prisoners’ Self-Help Litigation Manual by John Boston and Daniel Manville remains an excellent resource, even though the currently available 4th edition is nearly ten years old, having been published in 2010.
Introduction to IDOC’s Response

Following this report is the Illinois Department of Corrections’ (IDOC’s) written response to JHA’s July 2019 draft report.

In the summer of 2019, JHA invited IDOC to provide written responses to our reports which we would publish in tandem with our reports. JHA provided a draft of this report to IDOC on July 8th, 2019 and JHA received a written response from the Department on September 25th, 2019. IDOC’s response is published herein verbatim and without further JHA comment. JHA’s publication of IDOC’s response with our report should not be considered an endorsement or indicative of agreement by JHA of the information included.

JHA has always engaged in a review process with IDOC, providing the Department an opportunity to read, discuss, comment, respond, or act on JHA feedback from facility reviews as presented in our draft reports. For more information on our review process, please see JHA’s 2017 publication, How JHA’s Prison Monitoring Works, www.thejha.org/method.

We appreciate IDOC’s participation in this process. JHA will continue to monitor these and other issues.

We look forward to continuing to work with all stakeholders to advance reforms needed to achieve a system that is fair, humane and effective.
Illinois Department of Corrections/Office of Adult Education and Vocational Services

Response To

JHA Special Report July 2019- Law Library Services in IDOC

I. Access to law libraries is a pressing, chronic issue in prisons

Time available, size of library and staff: Law library schedules are locally established based on library staff and security availability. Offenders with legal deadlines receive extra time in the law library. Higher security level facilities like Menard, Pontiac, Stateville, Lawrence and Pinckneyville have more than one library staff available during library hours with one or more Correctional Law Library Assistant/s trained in criminal legal procedures and a librarian. There are 1 to 8 law clerks at each site under the supervision of civilian staff assisting library patrons. The Office of Adult Education and Vocational Services (OAEVS) is allocated 53 library positions statewide, but at any given time only have 35-40 of those filled. Law library size often limits the number of offenders who can be served at once e.g. Menard/Logan law libraries are small while Graham’s library is very large.

Lexis usage is being utilized and was limited at some sites due to technological issues. It is the first time for many offenders to have access to a technological device. OAEVS expects the “novelty” of the service to wear off and only those with legitimate legal research will use the machine.

1. Legal information sources:

- Thomson/Reuters book contract December 1, 2018 – November 30, 2021. Attached is the Legal Maintenance Agreement with title list and facility names
- Thomson/Reuters WestlawNext contract for civilian staff July1, 2019 – June 30, 2020 includes a subscription to National Primary Core/Analytical Plus for Government/National Reporter Images for Government (Westlaw PRO) databases
- Lexis kiosks provide offender direct access to National Reporters/Statutes, Shepard’s, numerous secondary sources, criminal/civil forms etc. with information sources being added daily
- Legal interlibrary loan through General Office of OAEVS from the IL Supreme Court Library’s collection. OAEVS has had an interagency agreement since 1993
- Master form list enclosed
- Federal court e-filing system is available at 12 facilities in the facilities’ law library
- Library staff and each law clerk received 1 copy of *Post-Trial Remedies: A Handbook for Illinois Prisoners* (2017 edition) by Illinois State Bar Association. Spanish version is also available from librarian who would print it out upon request. Offenders may obtain free copies directly from the Illinois State Board of Education (address available from library staff).
- One annual staff training offered to all password holders
- There were 4 training sessions offered to all staff (temporary assignments also) during fiscal year 2019 when the kiosks were installed at all IDOC sites (pilot program site employees had additional 3 trainings during fiscal year 2018)

2. Copying/Notarizing:

Statewide $0.10/side is charged for any copy made in the library. Indigent offenders fill out a voucher and is processed by business office, in case funds become available any time during their incarceration. Everyone is expected to read/review caselaw etc. in the library. Library staff may approve some copies to be taken back to the housing unit, but it is property stamped and expected to be returned. In case the document is not returned, the signed voucher is sent to the business office. Law library books are non-circulating.

Legal excess property boxes are holding all those copies. Some offenders have 20-30 legal excess property boxes. The last couple of decades IDOC/OAEVS became more paperless. Illinois courts, Attorney General’s Office and other state agencies etc., no longer print or send documents to offenders to our law libraries. Library staff with computer access is assumed to be the source to print those documents. Offenders wish to “own” documents instead of waiting to borrow from the library. Some libraries with a high number of indigent offenders provide 10 – 15 thousand copies per month. E-filing procedures have added extra copying and processing to IDOC library staff’s responsibilities while courts are reducing their copying and mailing costs.

Notary services are free of charge and available in most libraries.

3. Outside source legal requests:

General Office Librarian receives 1-5 letters a month form Governor’s Office, Legislative Reference Bureau etc. with complaints and document copy requests. Per agreement with those entities, the General Office Librarian responds to those requests. 95% of the requested material is available in the facility’s law library, kiosk and/or from Westlaw. Offender’s receive a letter form General Office Librarian to visit his/her facility’s library and he picks up the copy or receives instruction to locate it locally. Many offenders wish to obtain free copies.
JHA is welcome to send all requests to IDOC to be handled as describe above.

What is legally required?

The Illinois Department of Corrections chose, like most prison systems housing more than 40 thousand offenders throughout the United States, law library services as a cost-effective way to provide access to the courts. There are some states with smaller population where a "hybrid" type of service is offered. However, law librarians of prison libraries observed that continuity in legal services created problems requiring prison officials to also hire and train law librarians and paralegals as a backup. Pro bono legal clinic members have moved on in their profession and filling the gap was not easy. Also, the availability of qualified legal professionals is concentrated around bigger cities and law schools while most correctional facilities are in rural areas. Public defenders of Illinois have big caseloads and IDOC offenders usually are impatient with the slow response from their counsel.

*Bounds v. Smith* 430 U.S. 817, 97 S.Ct. 1491 (1977) has been variously interpreted by federal and states courts resulting in differing opinions nationally about how prison systems facilitate offenders' right of access to the courts. In *Lewis v. Casey*, 518 U.S. 343, 116 S.Ct. 2174 (1996), the United States Supreme Court declared that prison law libraries and legal assistance programs are not ends in themselves, but only the means for assuring "a reasonably adequate opportunity to present claimed violations of fundamental constitutional rights to the court", at 2180. "Bounds did not create an abstract, free-standing right to a law library or legal assistance ... meaningful access to the court is the touchstone. The inmate therefore must ... demonstrate that the alleged shortcomings in the library or legal assistance program hindered his efforts to pursue a legal claim. Bounds does not guarantee inmates the wherewithal to transform themselves into litigating engines... The tools it requires ... are those that the inmates need in order to attack their sentences, directly or collaterally, and in order to challenge the condition of their confinement. Impairment of any other litigating capacity is simply one of the incidentals (and perfectly constitutional) consequences of conviction and incarceration", at 2182.

The courts and John Howard Association fail to define, quantify and identify what is "adequate" and "permissible access" to the law libraries. Since there is no guidance or recommendations, it is left up to the IDOC to deem appropriate access for offenders.
II. IDOC should increase access to the law libraries

Recommendation 1: Expand law library hours and utilize addition space.

Law library operational hours can be increased only with additional library and security staff. Fiscal constraints and a qualified applicant pool have limited OAEVS in the past. Additional space for libraries could be implemented as population decreases.

Recommendation 2: Collaborate with Administrative Office of IL Courts to create standardized court forms

Find enclosed standardized form list available at all law libraries. They were created in collaboration with the court. Federal courts directly reach out to each e-filing site with any changes. Senior Paralegal or General Office Librarian’s update any necessary changes coming from e.g. Court Claims, Supreme Court etc.

Recommendation 3: Ensure continuous law library staffing and proper staff training.

IDOC and OAEVS make every effort to keep Correctional Law Library Assistant positions filled. However, all unionized employees have the right to move higher paying jobs. Prison librarianship is not taught in any school and requires on site training from senior employees. OAEVS offers continuing training to library staff e.g. WestlawNext, Lexis kiosk and cross training. Short term, temporary assignment employees (30 to 90 days) may not be able to offer the same level of law services. However, they are offered assistance from Sr. Paralegal and/or General Office Librarian.

Recommendation 4: Seek to establish partnership with law schools, librarians, and others.

Librarians have relationships with legal organizations and attend any training the courts may offer. OAEVS tried to find pro bono organizations and offer information about these organization in the law library, such as Illinois Legal Aid etc., but most require offenders to wait in line for services.

Court officials, such as Public Defenders, were invited in the past to attend our in-service training and OAEVS will consider offering it again.

Recommendation 5.: Increase the number of capable prisoner law clerks.

There is a non-formal program facilitated by library staff. Those completing the required work and pass a test receive a certificate. However, security requires law clerk rotation every 6 months and sometimes yearly. Additionally, law clerks receive lower
compensation than others with special skills with pay varying by institution which results in even greater turnover when they can obtain a higher paying job within the facility. This issue was submitted to administration for review in 2018.

**Recommendation 6.: Ensure libraries are adequately resourced**

Find response to ‘I’ and review all attachments. Only one title, “A self-help guide for section 1983 complaints, such as the Jailhouse Lawyer’s Handbook by the Center for Constitutional Rights & National Lawyers Guild” is not available from books, Lexis kiosk or through library staff from WestlawNext. Law and general library staff have internet access and the Lexis kiosk installation was completed during fiscal year 2019. Training is continuing and offered to any new staff.

IDOC DR-s (Title 20 IL Ad. Code) is available upon request. Each library has a folder with index to all sections of DR-s. When damaged or stolen from the folder, staff will print it from IDOC intranet. Law libraries are annually audit by staff and/or General Office Librarian.

**Recommendation 7.: Ensure people are equitably prioritized for time in the law library and require IDOC to formally respond to requests for law library**

OAEVS is using the very same prioritizing rules. Scheduling of offenders for library visits is done using Offender360 (IDOC computer-based record keeping on individuals). Attendance and missing scheduled library time are documented locally.

Services can be increased with additional staff and space.

**Recommendation 8.: Effectively implement tablet technology**

Not yet available

**Recommendation 9.: Create external prisoner legal aid for Illinois.**

OAEVS is not planning to do it.
Pre-printed forms from IDOC Libraries/DOC Legal:
- Petition for Order of Habeas Corpus Ad Testificandum
- Direct Appeals (State Court)
- Appeals to the Illinois Supreme Court
- Birth/Death/Marriage Certificate
- Procedure for filing for Return of Bond
- Civil Rights Act Petition Instruction
- Court of Claim Instructions
- Court of Claim Injury Claim Forms
- Court of Claim Property Claim Form
- Request for info from IDOC inmate master files (instruction only)
- Late Notice of Appeal
- Motion for Appointment of Counsel
- Living Will
- Mandamus
- Motion for Reduction of Sentence
- Nunc Pro Tunc/County Jail Credit
- Post-conviction Petition
- Purpose of Power of Attorney Forms & Instructions
- Demand for Speedy Trial and/or Quash Warrant
- State Habeas Corpus
- Motion for Trial Transcript and Common Law Records
- Withdrawal of Guilty Plea
- Executive Clemency
- Proof/Certificate of Service

Other forms: You may have other forms that are available from other sources. These include, but may not be limited to:

- Civil Rights Petitions (from all three district courts in Illinois, plus divisions)
- Habeas Corpus petitions (from all three district courts in Illinois, plus divisions)
- Writ of Certiorari U.S. Supreme Court
1. Affidavit-General
2. Proof of Service
3. Affidavit of Affirmation
4. 1983-Northern
5. 1983-Central
6. 1983-Southern
7. Intro. to State Court of Appeals—Direct Appeal
8. Late Notice of Appeal
9. Mtn. for Trial Transcripts and Common Law Records
10. Petition For Leave to Appeal
11. Writ of Certiorari
12. Post-Conviction
13. State Habeas Corpus
15. Fed. Habeas Corpus—Central
16. Fed. Habeas Corpus—Southern
17. 7th-Circuit Court of Appeals (lawsuit)
18. Executive Clemency
19. Habeas Corpus ad Tastificandum
20. IPP—Circuit Court
21. IPP—Sangamon County
22. IPP—Federal Appeal
23. Mandamus
24. Mtn. for Appointment of Counsel
25. Court of Claims—Medical
26. Court of Claims—Property
27. Power of Attorney—General
28. Power of Attorney—Property
29. Memo for filings in Livingston County
31. Federal—Southern—District—Civil Suit Instructions
32. Federal Southern District—Mtn. for Appointment of Counsel
33. Federal Southern District—In Forma Pauperis
34. Federal Southern District—IPP on Appeal
35. Federal Southern District—Service of Process
36. Federal Summons
37. Nunc Pro Tunc/County Jail Time Credit
38. Mtn. for Reduction of Sentence
39. Mtn. to Withdraw Guilty Plea
40. Mtn. for Speedy Trial/Quash Warrant
41. Procedure for Filing for Return of Bond
42. Trust Fund Certificate
43. Request for Info. from IDOC Master File
44. Request for Birth/Marriage/Death Certificate
## EXHIBIT 1

**IDOC LEGAL SUBSCRIPTION TITLE LIST starting 12/1/2018**

| Titles                                              | BMR | CEN | DAN | DEC | DIX | EMO | GRA | HIL | ILR | LAW | LIN | LOG | MEN | PIN | PON | ROB | SPA | SHE | SWI | STA | TAY | VAN | VIE | WES | KEW | JTC | MUR |
|-----------------------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| COMPLETE MANUAL OF CRIMINAL FORMS                  | 1   | 1   | 2   | 1   |     | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 0   | 1   |     |     |     |     |
| FEDERAL CIVIL JUDICIAL PROCEDURE & RULES           | 1   | 1   | 1   | 2   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 0   | 1   | 1   |     |     |     |
| FEDERAL CRIMINAL CODE & RULES PAMPHLET             | 1   | 1   | 1   | 1   | 2   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   |     |     |     |
| FEDERAL JURY INSTRUCTIONS                          | 1   |     | 1   |     |     |     | 1   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| FEDERAL REPORTER 3D                                | 1   | 1   | 1   | 1   | 2   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   |     |     |     |     |
| FEDERAL SUPPLEMENT 3D                              | 0   | 1   | 1   | 0   | 2   | 0   | 1   | 1   | 0   | 0   | 1   | 1   | 1   | 0   | 0   | 1   | 0   | 1   | 0   | 0   | 1   |     |     |     |     |
| HANDLING CRIMINAL APPEALS                          |     |     | 1   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IL CT RULES CIRCUIT COURT; STATE & FED (3 vols)    |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IL CRIMINAL LAW & PROCEDURE (soft-cover)           | 1   | 1   | 1   | 1   | 1   | 2   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 3   | 3   | 2   | 1   | 1   | 2   | 1   | 3   | 3   | 1   | 1   | 1   |
| IL DECISIONS                                        |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IL DIGEST 2D                                        | 1   | 1   | 1   | 1   | 2   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 2   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   |
| IL LEGISLATIVE SERVICE                             |     | 1   | 0   | 2   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 0   | 0   | 0   | 0   | 1   | 0   | 0   |     | 1   | 1   |
| IL PRACTICE, vols 5, 6 & 6A (partial set:Crim, P&Prac) |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| POST CONVICTION REMEDIES                           | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   |     |     |     |     |     |     |     |     |     |     |     |     |
| RIGHTS OF PRISONERS                                |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| SMITH-HURD IL COMPILED STATUTES ANNOTATED          |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| SUPREME COURT REPORTER + ADVANCE SHEET SUBSCRIP'T | 1   | 1   |     | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   |     |     |     |     |     |     |     |     |     |     |     |     |
| TRIAL HANDBOOK FOR IL LAWYERS                      |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| UNITED STATES CODE ANNOTATED, or                    | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   | 1   |     |     |     |     |     |     |     |     |     |     |     |     |
| WEST FEDERAL PRACTICE DIGEST 5TH partial            |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| AM JUR LEGAL FORMS                                 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| FEDERAL PROCEDURAL FORMS                           | 1   |     |     | 2   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IL CIVIL PRACTICE FORMS                            |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IL COMPILED STATUTES, STATE BAR (8 vols) update    |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IL EVIDENCE MANUAL                                 |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IL FORMS                                           | 1   |     | 1   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| IMMIGRATION LAW & DEFENSE                          |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| KNIBB FEDERAL COURT OF APPEALS MANUAL              | 1   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| WEST FEDERAL FORMS, VOLS 5,5A,5B,5C (CRIMINAL)    | 1   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |
| WEST FEDERAL FORMS, SET                            | 1   |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |     |