

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
 v.)
)
 CHRISTOPHER WORRELL,)
)
 Defendant.)
 _____)

Case No. 1:21-cr-292-RCL

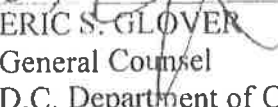
*not this before
Eric S. Glover
U.S.D.J. 10/13/21*

DECLARATION OF ERIC S. GLOVER

I, Eric S. Glover, certify that I am over 18 years of age, and I declare that the following is true to the best of my knowledge:

1. I am the General Counsel for the District of Columbia Department of Corrections, and I have served in this capacity since October 13, 2019.
2. After 3:00 p.m. on Friday, October 8, 2021, I received a court order from the United States Marshal Service (USMS) in this case.
3. The order directed DOC to provide the USMS with “narrative specialist notes from orthopedic hand specialist Dr. Wilson, who evaluated Mr. Worrell and is recommending proceeding with surgical repair.”
4. I am familiar with this case because on at least five previous occasions, I provided counsel for the United States or defense counsel with copies of Mr. Worrell’s DOC medical records. Although referenced in his Electronic Medical Record (EMR), the notes of Dr. Wilson, a doctor at Howard University Hospital, were not themselves in the EMR.
5. After receiving the October 8 order, I contacted DOC’s medical staff and requested a copy of Dr. Wilson’s notes on Mr. Worrell so that I could forward them to the USMS.

6. During our communication, the medical staff informed me that Mr. Worrell was scheduled for a follow-up appointment with Dr. Wilson on October 14, 2021, at Howard University Hospital. Medical staff also told me that they had requested that Mr. Worrell be returned to DOC with an updated copy of Dr. Wilson's notes, including any additions from the October 14, 2021 appointment.
7. That same afternoon, DOC's Office of General Counsel contacted the USMS and advised them of Mr. Worrell's October 14, 2021 appointment with Dr. Wilson and explained that DOC would receive updated medical notes from Dr. Wilson after that appointment. The updated medical notes would then be provided to the USMS.
8. Today, the Office of the General Counsel followed up with DOC medical staff on Mr. Worrell's records, and they confirmed this morning that administrative staff were in the process of scanning Dr. Wilson's notes and adding them to the Electronic Medical Record (EMR). Administrative staff do not work on the weekends or holidays. DOC again spoke with the USMS, before the Court issued its Show Cause Order, and advised that it was awaiting the addition of Dr. Wilson's medical notes to Mr. Worrell's EMR.
9. At approximately 3:35 p.m., DOC provided the USMS with a copy of the EMR now with Dr. Wilson's notes dated June 10 and July 8, 2021 included.


ERIC S. GLOVER
General Counsel
D.C. Department of Corrections

DATE EXECUTED: 10/12/21