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FILED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

2007 NOV -1 PM 3:15

U.S. DISTRICT COURT  
W.D.N.Y. - BUFFALO

MASHANS Hill,

Plaintiff;

Hon. HUGH B. SCOTT

07 CV 357

v.

Response/Counter Summary  
JUDGMENT MOTION

PAUL CURCIONE et al.

Defendants.

### Preliminary statement

As Plaintiff is in receipt of the Hon. Hugh B. Scott's order of Oct. 10<sup>th</sup>, 2007, advising that plaintiff respond to defendants' Motion to Dismiss by Nov. 30<sup>th</sup>, 2007, please be informed that plaintiff has not received a copy of the defendants' (Hohensee & Aiken) Motion, seeking the dismissal of his claims against them. Nonetheless, plaintiff will assume an affirmative defense against the position for.

Furthermore, plaintiff must express that he is presently in Elmira Corr. Esc.'s Special Housing Unit under unlawful deprivation - i.e., he has not had any personal property since Oct. 8<sup>th</sup>, 2007 (including all legal documents) against state 72 hour policy, has not been afforded showers nor recreation and is illegally in a

restricted diet, pending a disciplinary hearing. Therefore, plaintiff's ability to respond is impaired.

Moreover, in that plaintiff is in a present state of deprivation, and held within the bounds of time constraints to respond to the defendants' motion, and is not afforded appropriate access to a law library, plaintiff cannot attain the exact forms needed to perfect a counter-partial summary judgment motion under the appropriate subsec. & subd. of Rule 56 of the F.R.C.P. within a timely manner. However, plaintiff respectfully submits this document and ask that the court accept it as a motion, pursuant to Rules 26 & 56, moving the court to treat him partial summary judgment.

#### MOTION PURSUANT TO RULE 26(b)(c)(2): DISCOVERY

In response to defendants motion to dismiss & as a means of advancing plaintiff's claims, plaintiff ask that the defendants be compelled to furnish a copy of the following documents, in accordance with Rule 26(b):

1. All plaintiff's medical records from Mar. 28<sup>th</sup>, 2007 until departure from Niag. Co. Jail on Sept. 18<sup>th</sup>, 2007 - this is including Dr. Robert Buer's conclusions & treatment, and the medical treatment from the Niag. Co. Jail Medical dept., and
2. All grievances written by plaintiff against medical concerning treatment of and failure to treat his injuries that

were sustained on Mar. 28<sup>th</sup>, 2007.

In furtherance, plaintiff is aware that, according to Rule 26(d), discovery is not to be implemented prior to a discovery conference under Rule 26(f). However, this limitation may be altered by court order or stipulation. Such orders are authorized under Rule 26(c)(2), and asks that such order be granted in that plaintiff does not have a copy of the documents requested, which will prove his position.

Pursuant to Rule 56(a)-(b), plaintiff submits this counter motion as a response to the defendants' motion to dismiss asking that his claims be held to have merit and a judgment granted accordingly against the defendants.

#### STATEMENT OF UNDISPUTED FACTS

1. Plaintiff had sustained injuries that included nerve damage to the hands & wrists and a broken wrist bone on Mar. 29<sup>th</sup>, 2007;
2. Plaintiff had made the Hosp. to Jail Medical dept aware of his injuries, and that he needed pain medication and an examination on Mar. 29<sup>th</sup>, 2007;
3. Plaintiff had wrote formal complaints & grievances concerning Medical dept.'s failure to provide medication for pain and an Exam (see complaints & grievances attached to orig. complaint);

1. Plaintiff was examined by x-ray and found to have a broken wrist bone;

5. Plaintiff was taken to Dr. Robert Buer's Office on Apr. 6<sup>th</sup>, 2007 where he was given a cast;

6. On Apr. 14<sup>th</sup>, 2007, plaintiff was prescribed medication (Motrin) for the first time, which lasted for only a period of 10-days - i.e., until several weeks later when plaintiff was able to convince defendant Aikin to reconvene it;

7. Plaintiff was denied a medical exam regarding nerve injury claims;

8. Defendant Aikin was responsible for providing medication and/or referring plaintiff to Dr. Hohensee for ~~that~~ prescription medication that he cannot authorize;

9. Defendant Hohensee was responsible for providing pain medication & scheduling an exam regarding nerve injury;

10. Defendant Hohensee, though he denied nerve conduction study, he concedes that plaintiff's nerve may have injury;

11. Defendant Hohensee's denial of a referral for an exam (nerve conduction study) was based upon his own personal on-site ~~evaluation and his non-technological testing methods which has~~ no recording format that can be subjected to review other than what he, himself, has decided to document;

12. Plaintiff was kept on Motrin prescription from the date that it was reconvened until the date of departure from Miss. Co. Jail on Sept. 18<sup>th</sup>, 2007;

13. Plaintiff has denied more effective medication suitable to his injuries & medical concerns;

14. Defendant Hokensee argued that plaintiff has some sort of nerve injury, though he assumed it to be superficial and thus refused to further the investigation by way of more proficient technological means - i.e., means that could have measured the severity of plaintiff's injuries for the sake of appropriately treating him with pain medication and/or surgery, instead of assuming that plaintiff's concerns are minor and worthy of only Motrin, and

15. To date, plaintiff still has not been examined regarding nerve injury claims.

### ARGUMENT OF MATERIAL FACTS

1. To deprive an inmate any needed medical treatment that would be reasonably obtainable by the inmate if in society is to deprive the inmate of a constitutional right, see *Matzker v. Herr*, 746 F.2d 1142 (7th Cir. 1984) (delay of three months in ~~examining inmate with allegation of eye injury, though inmate seen for broken nose, causing pain and permanent injury states cause of action~~), and *Fambro v. Fulton Co.*, 713 F. Supp. 1426, 1429 (ND Ga. 1989) (delay of up to 3 days for medication, including critical medication like insulin or epileptic medication and delay of up to a week for over the counter medication part of ind-

Types of Violation):

2. TO deny an inmate medication to treat pain & suffering for 21 days beyond unreasonable and constitutes needless suffering, see *Fambro v. Fulton Co.*, supra

3. TO purposely deny an inmate medical treatment (medication) and an examination needed to discover & disclose facts concerning injuries caused by officers employed by the same institution by which the defendants are employed is indicative of conspiratorial behavior, see *Hampton v. Washington*, 600 F.2d 600, 620-23 (7th Cir. 1979) cert. denied, 446 U.S. 754 (1980), *Mullen v. Smith*, 738 F.2d 317, 318 (6th Cir. 1984) ("His complaints were answered with review & decision"), *Arcata v. Prison Health Serv.*, 769 F.2d 700, 704 (11th Cir. 1985); *Rosen v. Cheng*, 811 F. Supp. 754, 760 (DRI 1993) ("Grossly incompetent and recklessly inadequate examinations by a licensed physician is a deliberately indifferent exam. This is ineluctably so when the symptoms manifested scream of a diagnosis that virtually lies within the knowledge of a lay person.")

Wherefore, plaintiff asks that an order be entered granting relief in his behalf as the court may deem to just and proper.

Dated: Oct. 15th, 2007

In the absence of a notary public, I, Mashama Hill, de-  
poses & says, under the penalties of perjury, that  
the above is true & correct, except for that which has  
been stated upon information & belief.

Cordially,  
Mashama Hill  
PFD SE  
Elmira Corr. F&C.

To: JOEL J. JAYS, Jr., Esq.  
Leach, Brown, McCarthy  
& Gruber, P.C.  
1620 Liberty Bldg.  
420 Main St.  
Blo., N.Y. 14202

cc. Webster Szanyi LLP  
1400 Liberty Bldg.  
Blo., N.Y. 14202

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

MASHAMA Hill,

Plaintiff,

07 CV 357

RESPONSE / MOTION

v.

ANNEX

Paul CURCIONE et al.,

Defendants.

### INTRODUCTION

Please be informed that as of the evening of Oct. 15<sup>th</sup>, 2007, Plaintiff is now in receipt of a copy of the defendants' Motion to dismiss. Plaintiff ask that the following be accepted as an attachment to his response and motion.

### ARGUMENT

In the defendants' motion, it is stated that plaintiff failed to state a claim:

1. For serious medical need or condition, and
2. Claim of deliberate indifference.

Applying the standards of deliberate indifference, illustrated in the Defendants' Motion, to the instant case, it is clear that plaintiff's claims are meritorious from an objective & subjective standpoint. That is, objectively, plaintiff had sustained a broken wrist bone and nerve injury that has not been documentarily proven in that defendants deliberately have avoided allowing this to occur after being made aware of his condition.

For the broken bone, plaintiff was given a cast 9-days later and pain medication 21-days later, where in-between time plaintiff wrote complaints & grievances continuously making the defendants aware of the condition and providing them an opportunity to correct themselves and the problems, as standards require.

However, defendant did not provide medication until 21-days had elapsed and that had not only been Motrin (a medication for pain; insufficient for plaintiff's condition) but it had been prescribed for 10-days only. It was not until weeks thereafter that the medication was reconvened.

More-so, plaintiff was denied an exam for the sake of controlling his injuries. ~~Intentionally~~ plaintiff was told by defendants in the month of April, 2007, that, in the event he (plaintiff) is still in the facility after three (3) weeks, he will be scheduled for an exam (EMG), otherwise the Dept. of Corr. Serv. will deal with him (plaintiff). From said point, plaintiff was in the New York Jail for approx five months, wherefore he was refused an exam

and pain medication available to his injuries. This is indicative of conspiratorial deliberate indifference.

In addition, the courts have ruled that one need not prove the mental state of the defendant but rather the acts in which constitutes the state of mind thereof.

In the instant case, subjective prong being satisfied, the defendants have had numerous discussions with plaintiff and had become acutely aware of his concerns but purposely failed to act. Thus, plaintiff's suffering needlessly is not the result of negligence, especially in light of the fact that they are and were informed by way of formal complaint followed by grievances.

Moreover, in regards to any allegations that plaintiff had been doing particular types of exercises, plaintiff has not admitted to doing anything outside of his basic walk under the stressful & painful circumstances, nor are any of the allegations founded upon any facts, they are baseless assertions constructed by the Miss. Co. Jail Administration and used as a means to deny plaintiff medical care, and therefore must be considered as meritless attempts to save face.

Further to add, in the event that any of the allegations were true, it does not, in and of itself, negate the fact that plaintiff has injury and suffers from serious pain that requires treatment. A broken wrist bone clearly connotes pain other than minor. Also, take for example, there

are athletes that are injured seriously on a frequent basis but manage to sustain & maintain through rigorous activity by way of sheer will, therapy and/or pain medication.

In conclusion, plaintiff ask that the court consider carefully the facts herein stated and enter a ruling in his behalf.

Date: Oct. 15<sup>th</sup>, 2007

In the absence of a notary public, I, Mashona Hill, deposes and says, under the penalties of perjury, that the above is true & correct.

Cordially,  
Mashona Hill

To: Joel J. Tava, Jr., Esq.  
Roach, Brown, McCarthy  
& Gruber, P.C.

~~1620 Liberty Building~~

120 Main St.

Bldg., N.Y. 10002

CC: Webster 328 W 114  
1400 Liberty Bldg.  
Bldg., N.Y. 10002

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

Mohamed Hill,

Plaintiff,

Hon. HUGH B. SCOTT

07 CV 357

v.

Response / Counter Summary

JUDGMENT MOTION

Paul Curcio et al.,

Defendants.

### Preliminary statement

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Furthermore, Plaintiff must express that he is presently in Elmira Corr. Fac.'s Special Housing Unit under unlawful deprivation - i.e., he has not had any personal property since Oct. 8<sup>th</sup>, 2007 (including all legal documents) against state 72 hour policy, has not been afforded showers nor recreation and is illegally on

restricted diet, pending a disciplinary hearing. Therefore, plaintiff's ability to respond is impaired.

Moreover, in that plaintiff is in a present state of deprivation, and held within the bounds of time constraints to respond to the defendants' motion, and is not afforded appropriate access to a law library, plaintiff cannot attain the exact forms needed to perfect a counter-petition summary judgment motion under the appropriate subsec. & subd. of Rule 56 of the R.C.P. within a timely manner. However, plaintiff respectfully submits this document and ask that the court accept it as a motion, pursuant to Rules 26 & 56, moving the court to grant him partial summary judgment.

#### MOTION PURSUANT TO RULE 26(b)(1)(2): DISCOVERY

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1. All plaintiff's medical records from ~~Mar. 2007, 2007 until~~ departure from Niag. Co. Jail on Sept. 18<sup>th</sup>, 2007 - this is including Dr. Robert Buer's conclusions & treatment, and the medical treatment from the Niag. Co. Jail Medical Dept., and
2. All grievances written by plaintiff against medical concerning treatment of and failure to treat his injuries that

were sustained on Mar. 28<sup>th</sup>, 2007.

In furtherance, plaintiff is aware that, according to Rule 26(f), discovery is not to be implemented prior to a discovery conference under Rule 26(f). However, this limitation may be altered by court order or stipulation. Such orders are authorized under Rule 26(c)(2), and asks that such order be granted in that plaintiff does not have a copy of the documents requested, which will prove his position.

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#### STATEMENT OF UNDISPUTED FACTS

1. Plaintiff had sustained injuries that included nerve damage to the hands & wrists and a broken wrist bone on Mar. 28<sup>th</sup>, 2007;
2. Plaintiff had made the High Co. Jail Medical Dept. aware of his injuries, and that he needed pain medication and an examination on Mar. 29<sup>th</sup>, 2007;
3. Plaintiff had wrote formal complaints & grievances concerning Medical Dept.'s failure to provide medication for pain and an exam (see complaints & grievances attached to orig. complaint);

4. Plaintiff was examined by X-ray and found to have a broken wrist bone;

5. Plaintiff was taken to Dr. Robert Buer's Office on Apr. 6<sup>th</sup>, 2007 where he was given a cast;

6. On Apr. 19<sup>th</sup>, 2007, plaintiff was prescribed medication (Motrin) for the first time, which lasted for only a period of 10-days - i.e., until several weeks later when plaintiff was able to convince defendant Aikin to reconvene it;

7. Plaintiff was denied a medical exam regarding nerve injury claims;

8. Defendant Aikin was responsible for providing medication ~~and/or~~ referring plaintiff to Dr. Hohensee for ~~and~~ ~~prescription~~ medication that he cannot authorize;

9. Defendant Hohensee was responsible for providing pain medication & scheduling an exam regarding nerve injury;

10. Defendant Hohensee, though he denied nerve conduction study, he concedes that plaintiff's nerve may have injured;

11. Defendant Hohensee's denial of a referral for an exam (nerve conduction study) was based upon his own personal on-site evaluation ~~and his non-technological testing methods which has~~ no recording format that can be subjected to review other than what he, himself, has decided to document;

12. Plaintiff was kept on Motrin prescription from the date that it was reconvened until the date of departure from New York Jail on Sept. 18<sup>th</sup>, 2007;

13. Plaintiff has denied more effective medication suitable to his injuries & medical concerns;

14. Defendant Hohensee agreed that plaintiff has some sort of nerve injury, though he assumed it to be superficial and thus refused to further the investigation by way of more proficient technological means - i.e., means that could have measured the severity of plaintiff's injuries for the sake of appropriately treating him with pain medication and/or surgery, instead of assuming that plaintiff's concerns are minor and worthy of only Motrin, and

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ings of violation);

2. TO deny an inmate medication to treat pain & suffering for 21 days beyond unreasonable and constitutes ~~deliberate~~ suffering, see *Fembro v. Fulton Co.*, supra

3. TO purposely deny an inmate medical treatment (medication) and an examination needed to discover & disclose facts concerning injuries caused by officers employed by the same institution by which the defendants are employed is indicative of conspiratorial behavior, see *Hampton v. Hancock*, 600 F.2d 600, 620-23 (7th Cir. 1979) cert. denied, 446 U.S. 754 (1980), *Mullen v. Smith*, 738 F.2d 317, 318 (15th Cir. 1984) ("His complaints were answered with a ~~decision~~ decision), *Arce v. Prison Health Serv.*, 769 F.2d 701, 704 (11th Cir. 1985); *Rosen v. Chang*, 811 F. Supp. 754, 760 (SD 1993) ("Grossly incompetent and recklessly inadequate examinations by a licensed physician is a deliberately indifferent exam. This is ineluctably so when the symptoms manifested scream of a diagnosis that virtually lies within the knowledge of a lay person.")

Wherefore, plaintiff ask that an order be entered granting relief in his behalf as the court may deem so just and proper.

Dated: Oct. 15th, 2007

In the absence of a notary public, I, Mashama Hill, deposes  
& says, under the penalties of perjury, that the above  
is true & correct, except for that which has been  
stated upon information & belief.

Cordially  
Mashama Hill  
DIO 98  
EIN 112 CORR. F2L.

To: JIM J. JAYE, JR., ESQ.  
Rosen, Brown, McCarthy  
& Kruber, P.C.  
1620 Liberty Building  
420 MAIN ST.  
510, N.Y. 14202

cc. Webster Szalay LLP  
1400 Liberty Bldg.  
510, N.Y. 14202

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

~~Plaintiff~~  
Plaintiff,

02 CV 357

RESPONSE / MOTION

v.

ANNEX

PAUL PUCCIONE ET AL.  
Defendants.

### INTRODUCTION

PLEASE be informed that as of the evening of Oct 15<sup>th</sup>, 2007, Plaintiff is now in receipt of a copy of the defendants' Motion to dismiss. Plaintiff ask that the following be accepted as an attachment to his response and motion.

### ARGUMENT

In the defendants' Motion, it is stated that Plaintiff failed to state a claim:

1. For SERIOUS Medical need or condition, and
2. Claim of deliberate indifference.

Applying the standards of deliberate indifference, illustrated in the defendants' motion, to the instant case, it is clear that plaintiff's claims are meritorious from an objective ~~subjective~~ standpoint. That is, objectively, plaintiff had sustained a broken wrist bone and nerve injury that was not been documentarily proven in that defendants deliberately have avoided allowing this to occur after being made aware of his condition.

For the broken bone, plaintiff was given a cast 9-days later and pain medication 21-days later, where inbetween time plaintiff wrote complaints & grievances continuously making the defendants aware of the condition and providing them an opportunity to correct themselves and the problems, as standards require.

However, defendant did not provide medication until 21-days had elapsed and that had not only been Motrin (a medication for pain; insufficient for plaintiff's condition) but it had been prescribed for 10-days only. It was not until weeks thereafter that the medication was reconvened.

More-so, plaintiff was denied an exam for the sake of concealing his injuries. ~~Initially, plaintiff was told by defendants~~ in the month of April, 2007, that, in the event he (plaintiff) is still in the facility after three (3) weeks, he will be scheduled for an exam (EMG), otherwise the Dept. of Corr. Serv. will deal with him (plaintiff). From said point, plaintiff was in the Niseg Co. Jail for approx five months, wherefore he was refused an exam

and pain medication amiable to his injuries. This is indicative of conspiratorial deliberate indifference.

In addition, the courts have ruled that one need not prove ~~the mental state~~ of the defendant but rather the acts in which connotes the state of mind thereof.

In the instant case, subjective prong being satisfied, the defendants have had numerous discussions with plaintiff and had become acutely aware of his concerns but purposely failed to act. Thus, plaintiff's suffering needlessly is not the result of negligence, especially in light of the fact that they ~~are~~ and were informed by way of formal complaint followed by ~~exhaustive~~.

Moreover, in regards to any allegations that plaintiff ~~and~~ had been doing particular types of exercises, plaintiff has not admitted to doing anything outside of his basic ~~will~~ under the stressful & painful circumstances, nor are any of the allegations founded upon any facts, they are baseless assertions constructed by the Miss. Co. Jail administration and used as a means to deny plaintiff medical care, and therefore must be disregarded as ~~unsubstantiated~~ attempts to save face.

Further to add, in the event that any of the allegations were true, it does not, in and of itself, negate the fact that plaintiff has injury and suffers from serious pain that requires treatment. A broken wrist bone clearly connotes pain other than minor. Also, take for example, there

are athletes that are injured seriously on a frequent basis but manage to sustain & maintain through rigorous activity by way of sheer will, therapy and/or pain medication.

In conclusion, plaintiff ask that the court consider carefully the facts herein stated and enter a ruling in his behalf.

Date: Oct. 15<sup>th</sup>, 2007

In the absence of a notary public, I, Mashanna Hill, depose and say, under the penalties of perjury, that the above is true & correct.

Cordially,  
Mashanna Hill

cc: Joel J. Jans, Jr., Esq.  
Reich, Brown, McCarthy  
& Kruber, P.C.  
1620 Liberty Building  
420 Main St.  
Bro., N.Y. 14902

cc: Webster Szalay LLP  
1400 Liberty Bldg  
Bro., N.Y. 14902

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

~~Mashama Hill,~~

PLAINTIFF,

HON. HUBB B. SPOTT

07 CV 357

V.

AFFIDAVIT OF SERVICE

PAUL CURCIONE et al.,

DEFENDANTS.

~~AFFIDAVIT OF SERVICE PUR. TO F.R.C.P. RULE 7.1~~

PUR. TO F.R.C.P. RULE 7.1, I, Mashama Hill, the plaintiff  
in this matter, duly deposes, under the penalties of perjury,  
and says that the defendants were mailed a copy of his  
response and counter motion to their motion, at 1620 Liberty  
Bldg., 420 Main St., Bldg., N.Y., and a copy was also  
forwarded to 1400 Liberty Bldg., Bldg., N.Y. (Webster  
57341).

Dated: Oct. 15<sup>th</sup>, 2007

Cordially,  
Mashama Hill

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

~~Mashama Hill,~~

Plaintiff,

HON. HUGH B. SCOTT

07 CV 357

v.

AFFIDAVIT OF SERVICE

PAUL CURCIOLA et al.,  
Defendants.

~~AFFIDAVIT OF SERVICE PUR. TO F.R.C.P. RULE 7.1~~

Pur. to F.R.C.P. Rule 7.1, I, Mashama Hill, the plaintiff in this matter, duly deposes, under the penalties of perjury, and says that the defendants were mailed a copy of his response and counter motion to their motion, at 1620 Liberty Bldg., 420 Main St., 310, N.Y., and a copy was also forwarded to 1400 Liberty Bldg., 510, N.Y. (Webster 522415).

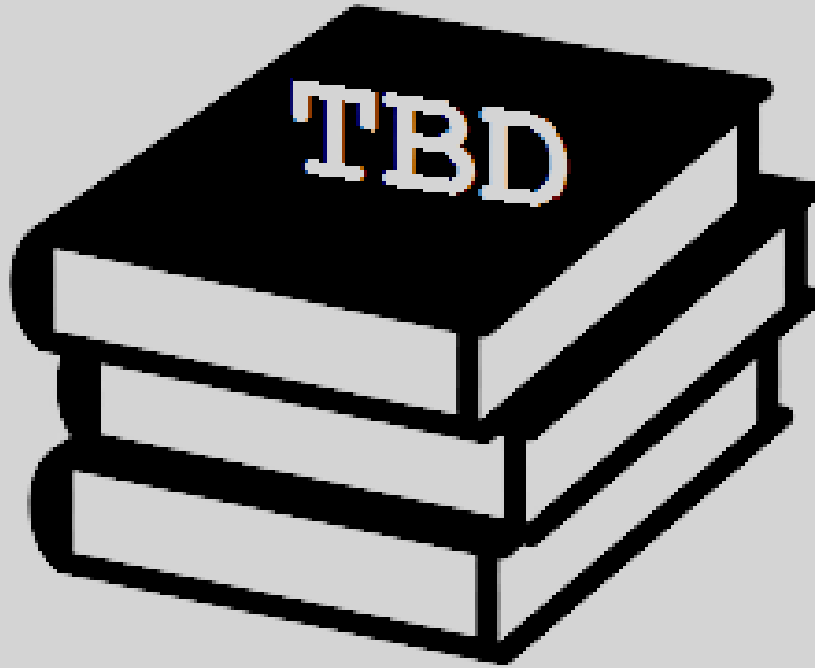
Dated: Oct. 15<sup>th</sup>, 2007

Cordially,  
Mashama Hill

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