

OPINIONS OF JOY C. JAY

1. Inadequate counseling services and inmate education.
2. Inadequate individual and group therapy.
3. Inadequate confidentiality for individual therapy.
4. Inadequate medication management.
5. Inadequate counselor training and supervision.
6. Inadequate treatment planning.
7. Inadequate consideration given to adverse effects of long-term segregation.
8. Inadequate pre-release and discharge planning.

Ms. Jay's opinions are based on her interviews of SCDC inmates and her review of inmate records, deposition transcripts, and the reports of Plaintiffs' experts.