

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ROBERT STANLEY, as Personal  
Representative for the ESTATE OF  
MARTHA STANLEY, Deceased,

Case No.  
Hon.

Plaintiff,

v

WAYNE COUNTY, a Municipal Entity,  
DEPUTY GRAHAM, and DEPUTY THOMAS,  
In Their Individual Capacity,

Defendants.

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GEOFFREY N. FIEGER (P30441)  
JAMES J. HARRINGTON (P65351)  
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**COMPLAINT AND DEMAND FOR JURY TRIAL**

NOW COMES, Plaintiff, ROBERT STANLEY, as Personal Representative for the ESTATE OF MARTHA STANLEY, Deceased, by and through his attorneys, FIEGER, FIEGER, KENNEY, & HARRINGTON, P.C., and for his Complaint and Jury Demand states the following against the above-named Defendants:

**JURISDICTION**

1. This is a civil action brought pursuant to the Civil Rights Act, 42 U.S.C. § 1981, *et seq.*, seeking monetary and punitive damages against Defendants under 42 U.S.C. § 1983, and costs and attorneys fees under 42 U.S.C. § 1988, for violations of

Plaintiff's rights under the Fifth, Eighth and/or Fourteenth Amendments to the United States Constitution.

2. This court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1343(a)(3), 1343(a)(4) and 42 U.S.C. § 1983.

3. The amount in controversy exceeds Seventy-Five Thousand (\$75,000.00) Dollars, excluding interest, costs, and attorney fees.

#### **VENUE**

4. Venue lies in the Eastern District of Michigan pursuant to 28 U.S.C. §1391(d). The events took place within Wayne County, Michigan, which is located within the jurisdiction of the United States District Court for the Eastern District of Michigan, Southern Division.

#### **PARTIES**

5. Plaintiff hereby reincorporates and restates each and every allegation contained in the preceding paragraphs of this Complaint as if set forth herein.

6. Defendant, WAYNE COUNTY, is a political subdivision and it is the body responsible for the control and oversight of its departments, agencies, and facilities including the Wayne County Sheriff's Office, Jail Division, as well as its Deputy Sheriffs, including, but not limited to Defendants DEPUTY GRAHAM and DEPUTY THOMAS.

7. At all times relevant to this lawsuit, Plaintiff's decedent, MARTHA STANLEY, was a pretrial detainee incarcerated in the Wayne County Jail (hereinafter "WCJ"). MARTHA STANLEY was arrested by the Detroit Police on May 29, 2018

and booked at the Detroit Detention Center before being transferred on May 29, 2018 to the WCJ pending further court action.

8. Plaintiff, ROBERT STANLEY, is the duly appointed Personal Representative for the Estate of MARTHA STANLEY, Deceased, who lives in Wayne County, Michigan.

9. Defendant, DEPUTY GRAHAM, and upon all information and belief, is a Wayne County Corrections Deputy and at all times relevant to this action was assigned to the Wayne County Jail. At all times relevant to this action, Defendant, DEPUTY GRAHAM, was acting under color of state law, and was acting in the course and scope of her employment with Wayne County. She is named in this action in her individual capacity.

10. Defendant, DEPUTY THOMAS, and upon all information and belief, is a Wayne County Corrections Deputy and at all times relevant to this action was assigned to the Wayne County Jail. At all times relevant to this action, Defendant DEPUTY THOMAS was acting under color of state law, and was acting in the course and scope of her employment with Wayne County. She is named in this action in her individual capacity.

### **FACTUAL STATEMENT**

11. Plaintiff hereby reincorporates and restates each and every allegation contained in the preceding paragraphs of this Complaint as if set forth herein.

12. On May 29, 2018, Plaintiff's decedent, MARTHA STANLEY, was a fifty-nine year old woman who was arrested by the Detroit Police and booked at the Detroit Correction Center for driving without her license.

13. At or around 7:30 p.m. on May 29, 2018, MARTHA STANLEY, was transferred to Wayne County Jail to be held pending court action.

14. At all times relevant hereto, Defendants, DEPUTY GRAHAM and DEPUTY THOMAS, were working during the time of MARTHA STANLEY's death.

15. At all times relevant hereto, MARTHA STANLEY was manifesting physical signs of substance withdrawal, such as profuse sweating, dehydration, and inability to walk, among other obvious physical signs of her deteriorating physical state.

16. At all times relevant hereto, MARTHA STANLEY became severely dehydrated due to Defendants' refusal to provide her with water or proper medical attention for her substance withdrawals, and the extreme heat in the building, among other inhumane conditions.

17. At all times relevant hereto, MARTHA STANLEY made her deteriorating condition even more outwardly obvious to Defendants, and anyone in her presence, by verbally begging Defendants to provide her with medical attention for her withdrawal symptoms and dehydration.

18. Upon all information and belief, Defendant, DEPUTY GRAHAM, responded to MARTHA STANLEY's pleas for medical attention, food, and water, by stating, "don't expect me to feel sorry for you. Don't expect me to give you any motherfucking sympathy."

19. At all times relevant hereto, MARTHA STANLEY expressed to Defendants, including but not limited to, DEPUTY GRAHAM and DEPUTY THOMAS, that she needed access to medical treatment, and DEPUTY GRAHAM deliberately ignored MARTHA STANLEY's pleas for assistance.

20. At all times relevant hereto, MARTHA STANLEY, was in need of emergent medical treatment, such as withdrawal medication and treatment for her dehydration while incarcerated at the WCJ, which was denied.

21. At all times relevant hereto, MARTHA STANLEY was not seen by appropriate medical personnel, despite repeated requests by MRS. STANLEY to receive medical treatment.

22. On May 30, 2018, MARTHA STANLEY called her sister and complained of the substandard and poor conditions at the WCJ, specifically, that the air conditioning in the facility was not working and that it was very hot.

23. During the time that MARTHA STANLEY was incarcerated at the WCJ, temperatures were exceptionally hot, hitting external record highs of over 85 degrees and creating an internal temperature much hotter, making the conditions with the WCJ cruel and unusual and leading to her dehydration and exacerbating her withdrawal symptoms.

24. At all times relevant hereto, MARTHA STANLEY, plead with the Defendants, DEPUTY GRAHAM and DEPUTY THOMAS, for food and water – which was denied.

25. At all times relevant hereto, the sink was broken and could not provide water access to anyone, and specifically, to MARTHA STANLEY.

26. At all times relevant hereto, MARTHA STANLEY was so physically weak from the abhorrent conditions that she was subjected to at the WCJ, specifically, no air conditioning in the building despite extreme heat, lack of medical treatment, and no access to food or water, that she eventually became unable to walk.

27. At all times relevant hereto, Defendants, DEPUTY GRAHAM and DEPUTY THOMAS, deliberately subjected MARTHA STANLEY to inhumane conditions due to the WCJ's lack of policies and procedures directing deputies working in the WCJ, specifically Defendants DEPUTY GRAHAM and DEPUTY THOMAS, to respond to inmates' requests for help, specifically, MARTHA STANLEY's requests for medical treatment, food, and water and relief from extreme heat, and actually provide these essential, basic human necessities.

28. On May 30, 2018, on the second day of being booked into the WCJ, MARTHA STANLEY was dead from dehydration.

29. Defendants, DEPUTY GRAHAM and DEPUTY THOMAS were aware that MARTHA STANLEY, if subjected to extreme heat while provided no access to air conditioning, especially when suffering from a serious medical condition (such as withdrawals) requiring medical treatment, compounded with no access to food or water, created inhumane conditions and a heightened, unreasonable risk of death.

30. At all times relevant hereto, Defendant, WAYNE COUNTY, caused and acquiesced to the Constitutional violations of the WCJ law enforcement staff, specifically Defendants, by virtue of its practice and custom of failing to train, supervise, and discipline its law enforcement officials, including the defendants named herein, in the proper basic humane requirements for those housed at the WCJ, including MARTHA STANLEY.

**COUNT I**  
**42 U.S.C. § 1983 – VIOLATION OF THE FIFTH AND FOURTEENTH**  
**AMENDMENTS – DELIBERATE INDIFFERENCE –**  
**DEFENDANTS DEPUTY GRAHAM AND DEPUTY THOMAS**

31. Plaintiff hereby reincorporates and restates each and every allegation contained in the preceding paragraphs of this Complaint as if set forth herein.

32. As a citizen of the United States and pretrial detainee at the Wayne County Jail, located in the State of Michigan, Plaintiff's Decedent, MARTHA STANLEY, was entitled to all rights, privileges, and immunities accorded to all pretrial detainees of the State of Michigan and of the United States.

33. Pursuant to the Fifth Amendment, through the Fourteenth Amendment, of the United States Constitution, at all times relevant, Plaintiff's Decedent, MARTHA STANLEY, had a right to have her serious medical needs addressed and not ignored while a pretrial detainee under the custody and control of Defendants.

34. At all times relevant hereto, MARTHA STANLEY was deprived of adequate and sufficient medical care and/or treatment such that her life would be preserved and she at all times would be free from needless, unjustified, and preventable pain, suffering, and deterioration of her health and well-being.

35. At all times relevant hereto, MARTHA STANLEY's serious medical needs were so obvious that a layman would recognize them. MARTHA STANLEY's obvious physical manifestations included profuse sweating, becoming so weak and frail that she was unable to walk, withdrawal symptoms, verbally expressing that she was in anguish, and begging Defendants for medical assistance, food, and water.

36. The actions and omission of acts by Defendants DEPUTY GRAHAM

AND DEPUTY THOMAS demonstrated a deliberate indifference and were performed knowingly, deliberately, indifferently, intentionally, maliciously, and with gross negligence, callousness, and deliberate indifference to Plaintiff's Decedent, MARTHA STANLEY's, well-being and serious medical needs that were so obvious that even a layperson would easily recognize the necessity for a doctor's attention, which posed an obvious risk of substantial harm to MARTHA STANLEY and caused constitutional deprivation of her individual rights including, but not limited to the following:

- a. Deliberately ignoring Plaintiff's Decedent's obvious serious medical needs and failing to obtain medical attention within a reasonable time frame;
- b. Depriving Plaintiff's Decedent of adequate fluids and/or nutrition;
- c. Failure to obtain medical attention for Plaintiff's Decedent's obvious profuse sweating;
- d. Failure to provide essential medications or treatment, crucial for Decedent's, MARTHA STANLEY's, well being;
- e. Failure to obtain medical attention for Plaintiff's Decedent's obvious weakness;
- f. Failure to obtain medical attention for Plaintiff's Decedent's obvious fatigue;
- g. Failure to obtain medical attention for Plaintiff's Decedent's obvious dehydration;
- h. Failure to obtain treatment for Plaintiff's Decedent by not emergently transferring her to a hospital for medical treatment;
- i. Failure to obtain intravenous nutrition, medication or treatment for Plaintiff's Decedent;
- j. Failure to provide close monitoring and supervision for Plaintiff's Decedent;



- k. Failure to obtain electrolyte replacement for Plaintiff's Decedent;
- l. Failure to provide cardiac monitoring and/or hospitalization for Plaintiff's Decedent;
- m. Any and all other breaches as they become known throughout the course of this litigation.

37. As a direct and proximate result of the actions and/or omissions of Defendants, DEPUTY GRAHAM and DEPUTY THOMAS, Plaintiff's decedent, MARTHA STANLEY, suffered great physical pain, discomfort, humiliation, degradation, anguish, and, ultimately, died due to lack of access to her medications, exposure to dangerously high temperatures, lack of water and the effects thereof, or otherwise, the deliberate indifference to MARTHA STANLEY's serious medical needs.

38. As a direct and proximate result of the acts and/or omissions of Defendants', DEPUTY GRAHAM and DEPUTY THOMAS, Plaintiff has sustained and is entitled to compensation for conscious pain and suffering of the Deceased, funeral, burial, and economic costs and/or damages, loss of support, loss of gifts and gratuities and loss of love, society and companionship.

39. The conduct of Defendants, DEPUTY GRAHAM and DEPUTY THOMAS, was and remains extreme and outrageous subjecting Defendants to punitive damages.

WHEREFORE, Plaintiff requests the following relief:

- a. Reasonable medical, hospital, funeral and burial expenses;
- b. Conscious pain and suffering;
- c. Loss of financial support;

- d. Loss of service;
- e. Loss of gifts or other valuable gratuities;
- f. Loss of comfort, society and companionship;
- g. Compensatory and punitive damages;
- h. Reasonable attorney fees, costs and interest; and
- i. Such other and further relief as appears reasonable and just under the circumstances and otherwise recoverable under 42 U.S.C. §§ 1983 and 1988.

**COUNT II**  
**42 U.S.C. §1983 - CONDITIONS OF CONFINEMENT AND**  
**CRUEL AND UNUSUAL TREATMENT -**  
**DEFENDANTS DEPUTY GRAHAM, DEPUTY THOMAS AND**  
**WAYNE COUNTY**

40. Plaintiff hereby reincorporates and restates each and every allegation contained in the preceding paragraphs of this Complaint as if set forth herein.

41. At all times relevant hereto, the conduct of all of the Defendants, deprived Plaintiff's Decedent, MARTHA STANLEY, of her clearly established rights, privileges and immunities guaranteed to her under the United States Constitution as a pretrial detainee, specifically, those set forth under the 14<sup>th</sup> Amendment, which are analogous to the 8<sup>th</sup> Amendment guarantees for a convicted person and include MARTHA STANLEY's right as a pretrial detainee to be free from cruel and unusual treatment.

42. At all times relevant hereto, the conditions of MARTHA STANLEY's confinement at the WCJ and her treatment by the Defendants amounted to cruel and unusual treatment, as evidenced below, and caused a Constitutional deprivation of her individual rights including, but not limited to the following:

- a. Failure to provide relief from extreme heat and to keep the internal temperatures of the building reasonable;
- b. Depriving Plaintiff's Decedent, MARTHA STANLEY, of adequate fluids and/or nutrition;
- c. Deliberately ignoring Plaintiff's Decedent's obvious, serious medical needs and failing to obtain medical attention within a reasonable time frame;
- d. Depriving the Plaintiff's Decedent of a clean, habitable environment;
- e. Failure to obtain medical attention for Plaintiff's Decedent's obvious profuse sweating;
- f. Failure to provide essential medications or treatment, crucial for Decedent's, MARTHA STANLEY's, well-being;
- g. Failure to obtain medical attention for Plaintiff's Decedent's obvious weakness;
- h. Failure to obtain medical attention for Plaintiff's Decedent's obvious fatigue;
- i. Failure to obtain medical attention for Plaintiff's Decedent's obvious dehydration;
- j. Failure to obtain treatment for Plaintiff's Decedent by not emergently transferring her to a hospital for medical treatment;
- k. Failure to obtain intravenous nutrition, medication or treatment for Plaintiff's Decedent;
- l. Failure to provide close monitoring and supervision for Plaintiff's Decedent;
- m. Failure to obtain electrolyte replacement for Plaintiff's Decedent;
- n. Failure to provide cardiac monitoring and/or hospitalization for Plaintiff's Decedent;
- o. Any and all other breaches as they become known throughout the course of this litigation.

43. The conduct of Defendants DEPUTY GRAHAM and DEPUTY THOMAS was and remains extreme and outrageous subjecting Defendants to punitive damages.

WHEREFORE, Plaintiff requests the following relief:

- a. Reasonable medical, hospital, funeral and burial expenses;
- b. Conscious pain and suffering;
- c. Loss of financial support;
- d. Loss of service;
- e. Loss of gifts or other valuable gratuities;
- f. Loss of comfort, society and companionship;
- g. Compensatory damages;
- h. Reasonable attorney fees, costs and interest; and
- i. Such other and further relief as appears reasonable and just under the circumstances and otherwise recoverable under 42 U.S.C. §§ 1983 and 1988.

**COUNT III**  
**42 U.S.C. §1983 – UNCONSTITUTIONAL POLICIES/PROCEDURES:**  
**FAILURE TO TRAIN –**  
**DEFENDANT WAYNE COUNTY**

44. Plaintiff hereby reincorporates and restates each and every allegation contained in the preceding paragraphs of this Complaint as if set forth herein.

45. WAYNE COUNTY developed and maintained policies or customs establishing deliberate indifference to the Constitutional rights of persons in the county, specifically, of those housed in the WCJ, which led to the Constitutional violations Plaintiff's Decedent, MARTHA STANLEY, was subjected to.

46. At all times relevant hereto, WAYNE COUNTY failed to train WCJ law enforcement, specifically Defendants, to respond when inmates request medical attention for serious medical conditions, specifically MARTHA STANLEY's requests for medical attention for her severe substance withdrawals and to make living conditions humane by not subjecting inmates to extreme heat and providing basic essentials such as food, water and hydration, especially in extreme heat.

47. Defendant, WAYNE COUNTY, caused the Constitutional violations by virtue of its practice and custom of failing to train, supervise, and discipline its law enforcement officials, including the Defendants named herein, in the proper standards of care for those housed at the WCJ, including Plaintiff's Decedent, MARTHA STANLEY.

48. At all times relevant hereto, serious deficiencies exist in the training of law enforcement officials at the WCJ, to the extent that the majority, if not all, did not meet basic constitutional requirements, and specifically Defendants DEPUTY GRAHAM and DEPUTY THOMAS. The above mentioned deficiencies in conduct were on-going customs, procedures and policies of the Defendant, WAYNE COUNTY.

49. At all times relevant hereto, the inadequate training and certification of law enforcement officials represented WAYNE COUNTY's customs, policies and procedures and demonstrated a deliberate indifference on the part of policy makers of WAYNE COUNTY, to the Constitutional rights of persons held within the Wayne County Jail, and were the moving force causing the violations of Plaintiff's Decedent, MARTHA STANLEY's rights as alleged herein.

50. At all times relevant hereto, the above described policies and customs were a moving force behind law enforcement officials, specifically the Defendants', deliberate conduct which deprived MARTHA STANLEY of her Constitutional rights.

51. As a result of the above described policies and customs, law enforcement officials of WAYNE COUNTY, including the Defendant officers, MARTHA STANLEY was deprived of her rights guaranteed by the Fifth, Eighth and Fourteenth Amendments to the United States Constitution.

52. As a direct and proximate result of Defendant WAYNE COUNTY's inadequate, reckless, and grossly negligent training and supervision, Defendants DEPUTY GRAHAM and DEPUTY THOMAS violated and caused MARTHA STANLEY's constitutional deprivation of her clearly established rights, privileges and immunities of the Constitution of the United States, including, but not limited to:

- a. Failure to provide relief from extreme heat and to keep the internal temperatures of the building reasonable;
- b. Depriving Plaintiff's Decedent, MARTHA STANLEY, of adequate fluids and/or nutrition;
- c. Deliberately ignoring Plaintiff's Decedent's obvious, serious medical needs and failing to obtain medical attention within a reasonable time frame;
- d. Depriving the Plaintiff's Decedent of a clean, habitable environment;
- e. Failure to obtain medical attention for Plaintiff's Decedent's obvious profuse sweating;
- f. Failure to provide essential medications or treatment, crucial for Decedent's, MARTHA STANLEY's, well-being;
- g. Failure to obtain medical attention for Plaintiff's Decedent's obvious weakness;

- h. Failure to obtain medical attention for Plaintiff's Decedent's obvious fatigue;
- i. Failure to obtain medical attention for Plaintiff's Decedent's obvious dehydration;
- j. Failure to obtain treatment for Plaintiff's Decedent by not emergently transferring her to a hospital for medical treatment;
- k. Failure to obtain intravenous nutrition, medication or treatment for Plaintiff's Decedent;
- l. Failure to provide close monitoring and supervision for Plaintiff's Decedent;
- m. Failure to obtain electrolyte replacement for Plaintiff's Decedent;
- n. Failure to provide cardiac monitoring and/or hospitalization for Plaintiff's Decedent;
- o. Any and all other breaches as they become known throughout the course of this litigation.

53. As a direct and proximate result of the acts and/or omissions of Defendant WAYNE COUNTY, Plaintiff has sustained and is entitled to compensation for conscious pain and suffering of the Deceased, funeral, burial, and economic costs and/or damages, loss of support, loss of gifts and gratuities and loss of love, society, and companionship.

WHEREFORE, Plaintiff requests the following relief:

- a. Reasonable medical, hospital, funeral and burial expenses;
- b. Conscious pain and suffering;
- c. Loss of financial support;
- d. Loss of service;
- e. Loss of gifts or other valuable gratuities;

- f. Loss of comfort, society and companionship;
- g. Compensatory damages
- h. Reasonable attorney fees, costs and interest; and
- i. Such other and further relief as appears reasonable and just under the circumstances and otherwise recoverable under 42 U.S.C. §§ 1983 and 1988.

**COUNT IV**

**42 U.S.C. §1983 – UNCONSTITUTIONAL POLICIES/PROCEDURES:  
SYSTEMATIC ACQUIESCENCE TO UNCONSTITUTIONAL CONDUCT BY  
EMPLOYEES – DEFENDANT WAYNE COUNTY**

54. At all times relevant hereto, Defendant, WAYNE COUNTY, participated in training and/or encouraging the law enforcement staff at the WCJ to not respond to and deliberately ignore the inmates' statements regarding their medical condition; training and/or encouraging the law enforcement staff to refuse to evaluate the inmates, or otherwise investigate the inmates' complaints regarding medical issues; refused to provide the law enforcement staff with any training with regard to the WCJ's policies and procedures; refused to provide the law enforcement staff with copies of the WCJ's policies and procedures; and, refused to show the law enforcement staff where to locate copies of the WCJ's policies and procedures. Accordingly, WAYNE COUNTY implicitly authorized, approved, or knowingly acquiesced in the inferior and substandard treatment of inmates with serious medical needs and knew or should have known that such treatment would deprive an individual of a constitutional right.

55. Upon information and belief, instead of suspending or disciplining the law enforcement staff at the Jail for failing to address the inmates' complaints regarding medical issues and for deliberately ignoring serious medical needs, and ignoring complaints regarding unconstitutional conditions of confinement, WAYNE COUNTY



refused to discipline the law enforcement staff at the WCJ, failed to fully investigate inmate allegations regarding the law enforcement staff's refusal to obtain medical treatment and ensure humane living conditions, looked the other way and, thus, tacitly encouraged such behavior. In doing so, WAYNE COUNTY condoned, ratified, or encouraged the WCJ law enforcement staff to refuse to obtain medical treatment and to deliberately ignore the MARTHA STANLEY's above described serious medical needs on numerous occasions as a matter of policy.

56. At all times relevant hereto, the corrections officers at the WCJ were trained not to believe anything that the inmates said or reported. Specifically, the corrections officers were trained not to believe the inmates' statements regarding their medical condition and not to provide the inmates' medical kites to the medical staff at the jail, thereby deliberately ignoring the inmates' serious medical needs.

57. At all times relevant, there was a complete failure to train and supervise the corrections officers and the WCJ law enforcement staff and/or the training and supervision the law enforcement staff was so reckless that future violations of the inmates' rights to medical attention for serious medical needs were inevitable or substantially certain to result, as described in the preceding paragraphs.

58. At all times relevant, Defendant, WAYNE COUNTY was on notice that the training and/or supervision of the corrections officers at the WCJ with regard to the inmates' right to medical attention for serious medical needs was deficient and likely to cause injury, as described in the preceding paragraphs.

59. At all times relevant hereto, Defendant WAYNE COUNTY's response

to this knowledge was so inadequate as to show a complete disregard for whether the WCJ's law enforcement staff would violate the inmates' rights to medical attention for serious medical needs and demonstrated a complete acquiescence and custom and/or practice of tolerating the violation of federal rights by its officers or agent.

60. Defendant WAYNE COUNTY's custom and policy of acquiescing to its deputies' unconstitutional conduct was the moving force behind Defendants DEPUTY GRAHAM and DEPUTY THOMAS conduct, and, as a result, the Defendant Deputies violated and caused MARTHA STANLEY's constitutional deprivation of her clearly established rights, privileges, and immunities of the Constitution of the United States, including, but not limited to:

- a. Failure to provide relief from extreme heat and to keep the internal temperatures of the building reasonable;
- b. Depriving Plaintiff's Decedent, MARTHA STANLEY, of adequate fluids and/or nutrition;
- c. Deliberately ignoring Plaintiff's Decedent's obvious, serious medical needs and failing to obtain medical attention within a reasonable time frame;
- d. Depriving the Plaintiff's Decedent of a clean, habitable environment;
- e. Failure to obtain medical attention for Plaintiff's Decedent's obvious profuse sweating;
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- g. Failure to obtain medical attention for Plaintiff's Decedent's obvious weakness;
- h. Failure to obtain medical attention for Plaintiff's Decedent's obvious fatigue;

- i. Failure to obtain medical attention for Plaintiff's Decedent's obvious dehydration;
- j. Failure to obtain treatment for Plaintiff's Decedent by not emergently transferring her to a hospital for medical treatment;
- k. Failure to obtain intravenous nutrition, medication or treatment for Plaintiff's Decedent;
- l. Failure to provide close monitoring and supervision for Plaintiff's Decedent;
- m. Failure to obtain electrolyte replacement for Plaintiff's Decedent;
- n. Failure to provide cardiac monitoring and/or hospitalization for Plaintiff's Decedent;
- o. Any and all other breaches as they become known throughout the course of this litigation.

61. As a direct and proximate result of the acts and/or omissions of Defendant WAYNE COUNTY, Plaintiff has sustained and is entitled to compensation for conscious pain and suffering of the Deceased, funeral, burial, and economic costs and/or damages, loss of support, loss of gifts and gratuities and loss of love, society and companionship.

WHEREFORE, Plaintiff requests the following relief:

- a. Reasonable medical, hospital, funeral and burial expenses;
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- d. Loss of service;
- e. Loss of gifts or other valuable gratuities;
- f. Loss of comfort, society and companionship;
- g. Compensatory damages;

- h. Reasonable attorney fees, costs and interest; and
- i. Such other and further relief as appears reasonable and just under the circumstances and otherwise recoverable under 42 U.S.C. §§ 1983 and 1988.

Respectfully submitted by,

/s/ James J. Harrington, IV  
JAMES J. HARRINGTON, IV (P65351)  
GEOFFREY N. FIEGER (P30441)  
Fieger, Fieger, Kenney & Harrington  
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(248) 355-5555  
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Dated: July 12, 2018

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

ROBERT STANLEY, as Personal  
Representative for the ESTATE OF  
MARTHA STANLEY, Deceased,

Case No.  
Hon.

Plaintiff,

v

WAYNE COUNTY, a Municipal Entity,  
DEPUTY GRAHAM, and DEPUTY THOMAS,  
In Their Individual Capacity,

Defendants.

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**PLAINTIFF'S DEMAND FOR TRIAL BY JURY**

Plaintiff ROBERT STANLEY, as Personal Representative for the ESTATE OF  
MARTHA STANLEY, Deceased, by and through her attorneys, FIEGER, FIEGER,  
KENNEY, & HARRINGTON, P.C., hereby requests trial by jury in this matter.

Respectfully submitted by,

/s/ James J. Harrington, IV  
JAMES J. HARRINGTON, IV (P65351)  
GEOFFREY N. FIEGER (P30441)  
Fieger, Fieger, Kenney & Harrington  
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Dated: July 12, 2018