



EQUAL JUSTICE AMERICA

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EJA FELLOWSHIP RECIPIENT



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LAW SCHOOL	Temple Law School
ORGANIZATION	Pennsylvania Institutional Law Project

Update 1:

I started my internship at the Pennsylvania Institutional Law Project (PILP) on 6/3. Despite just starting, I have already gained extensive experience. I had the opportunity to write a memorandum involving Fed. R. Civ. P. 26 and 35 for our class action about solitary confinement. I also observed a settlement hearing for a client who received improper medical treatment while incarcerated. I learned how negotiating can be just as adversarial and passionate as litigation. I also gathered data about the number of people currently incarcerated in prisons and jails in the Northeast and Southeast areas of Pennsylvania. Currently, I am writing another memorandum about ADA suit eligibility for clients who have used illegal drugs. Through research, I learned about the types of treatment generally available for people suffering with addiction, and the lack of treatment available to people who are incarcerated. Additionally, I am reviewing case materials for possible appellate litigation PILP may pursue. My internship at PILP has reaffirmed my passion for civil rights and public interest. I have enjoyed working with the small but passionate team at PILP so far, and I am excited about the rest of the internship.

Update 2:

Since my last update, I have had the opportunity to observe a deposition related to a prison's use of medication-assisted treatment for incarcerated people suffering from opioid use disorder. I also collected data about the number of people incarcerated at jails and prisons in Pennsylvania. I learned that a lot of county jails are discrete about their current incarcerated population. I wrote another memo discussing the grounds for appeal and likelihood of successfully appealing for a pro-se medical malpractice case. I am also sorting through discovery documents and familiarizing myself with the bates numbering system. Additionally, PILP had a retreat on June 25th, so I was able to meet more of the attorneys and staff who work outside of Philadelphia where I am based.

Update 3:

Since my last update, I have observed two more depositions related to a prison's use of medication-assisted treatment for incarcerated people suffering from opioid use disorder. Most of



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the deposes were some sort of medical care professionals. I learned that doctors, psychologists, and other medical staff are not as unbiased as I thought. The medical field has its own biases and corruption, especially with medical staff at correctional facilities. I also did background research on the deposes. I looked into their professional and personal background using Google and their legal background using Pacer.

I also watched an oral argument before the United States District Court for the Eastern District of Pennsylvania. PILP was involved in a class action against Philadelphia involving the abhorrent conditions of the city's jails. The city settled but was not complying with the court-monitored settlement agreement. Therefore, PILP and the other plaintiff organizations filed a motion for contempt. The oral argument I watched was about this motion for contempt. It was my first time in a federal court. I learned a lot about oral arguments and got to see two different styles of argumentation.

Additionally, I wrote another memo that looked into the merits of successfully appealing a possible case. I learned about the difficulty of making an Eighth Amendment deliberate indifference claim. While there are a lot of nuances, the case law is not plaintiff-friendly for incarcerated people.

Update 4:

Since my last update, I watched an evidentiary hearing at the United States District Court for the Eastern District of Pennsylvania. This was involving the same Philadelphia jail conditions case that I mentioned last update. Originally, the city and correctional defendants were supposed to present evidence about them complying with the settlement agreement. However, the city did not put forth any additional evidence during the hearing. Instead, the court heard final arguments and ruled to hold the city in contempt. This is a win for PILP and our incarcerated clients. Hopefully, the city will start to improve conditions and comply in the future.

I also wrote two more memos since my last update. I researched and wrote about how to make APA and *Accardi* challenges against immigration detention facilities. With this research, I was able to apply what I learned from my constitutional and immigration law classes during 1L. Likewise, I researched and wrote about the relevance of a prisoner's home district in a proper venue analysis. Lots of clients are not incarcerated where they are originally from but would still prefer to pursue litigation from their hometown.

Update 5:

Since my last update, I attended more three depositions involving a prison's use of medication-assisted treatment for incarcerated people suffering from opioid use disorder. In total, I observed eight different depositions. I saw three different attorneys conduct the depositions, so I was able to learn different approaches. It is best to be friendly but diligent.

Additionally, I went to SCI-Phoenix with an attorney to visit an incarcerated client. This was my first time going to a state prison. I have been to local jails several times before during previous internships. However, SCI-Phoenix was much larger and more secure. The guards were also quite rude and lied to us a few times. Overall, I am glad I got to see and interact with a client. I helped take notes during the conversation and wrote a memo summarizing the visit.



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I also wrote a memo involving the retroactive application of a new assessment tool for parole programming. This involved looking into the ex post facto clause. In total, I wrote seven memos this summer. While this may seem like a heavy workload, I appreciate it because I have become a stronger writer. During my first year of law school, I spent months on a single memo. I often spent weeks just researching legal databases. During this internship, I learned how to effectively and extensively research on both LexisNexis and Westlaw within a day. I can also write a full memo in another day. I researched various topics that I was completely unfamiliar with such as the ADA, APA, federal rules of evidence, opioid use disorder, and the eighth amendment.

Furthermore, I recently had two quick research assignments. For the first one, I had to research if prevailing defendants could be awarded attorney's fees under 42 U.S. Code § 1988. I looked into possible defenses to such a claim. I also researched if a correctional officer's response to grievances could violate hearsay.

Overall, my internship experience has been amazing. I improved my legal research and writing, networked, learned about prison litigation, and observed several court proceedings. Most importantly, I was able to contribute to my PILP's advocacy and litigation in order to help our incarcerated clients.