

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

ANTHONY TILLMAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 4:21-cv-299
	)	
CITY OF ST. LOUIS, MISSOURI,	)	
ADRIAN BARNES, <i>in his official</i>	)	
<i>capacity</i> , and	)	
COMMISSIONER DALE GLASS, <i>in his</i>	)	
<i>official capacity</i> ,	)	
	)	
Defendants.	)	

**STIPULATION**

For purposes of Plaintiff Anthony Tillman’s *Motion for Preliminary Injunction*, ECF No. 33, Mr. Tillman and Defendants City of St. Louis, Barnes and Glass stipulate as follows:

1. Defendants shall provide Mr. Tillman with assistance with showering in accordance with the “Memorandum Regarding Shower Procedure for Tillman, Anthony,” attached as Exhibit 1, for the pendency of this litigation.
2. Defendants shall order a shower transfer bench and a non-slip mat for the shower floor within 3 business days of entry of this stipulation, and provide it to Mr. Tillman for the pendency of this litigation.
3. Provisions 1 – 2 above may be temporarily suspended if a qualified medical provider determines that Mr. Tillman should not be allowed to shower for medical reasons, or if circumstances arise in which showering may present a threat to the safety or security of the City Justice Center (“CJC”), its detainees,

or employees. Defendants shall promptly notify Plaintiff's counsel of any such determination, in writing.

4. Defendants shall inform its employees and the contracted employees of Corizon Medical Services who have contact with Mr. Tillman at CJC of the provisions of this Stipulation.
5. Mr. Tillman shall withdraw his *Motion for Preliminary Injunction*, ECF No. 33.
6. All aforementioned terms of this Stipulation come into effect upon the Parties' filing of this Stipulation.

This stipulation does not affect Mr. Tillman's claims against the Defendant City, Superintendent Barnes, and Commissioner Glass. All parties reserve the right to litigate and defend these claims outside of the Preliminary Injunction stage of litigation.

Dated: March 26, 2021

Respectfully submitted,

Respectfully submitted,  
Michael Garvin,  
CITY COUNSELOR

ARCHCITY DEFENDERS, INC.

/s/Emanuel Powell

/s/ J. Brent Dulle #59705(MO)  
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City Justice Center

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**MEMO - Medical**

**TO:** CJC Custody/Medical Staff

**FR:** BFMallard, MD – SMD & Kristina Davis HSA

**DATE:** 3/19/2021

**RE:** Shower procedure for  
Tillman, Anthony ID# 175738

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Mr. Tillman stated that he plans on showering every other day starting on Monday 3/25/2021 during day shift and at this time he will notify the medical officer and charge nurse that he is ready to shower. A medical staff member will confirm that they are available to provide a stand by assist for Mr. Tillman to transfer to the shower chair. After Mr. Tillman is transferred into the shower chair the medical staff member will secure the seat handle in place and allow Mr. Tillman 10-15 minutes of privacy to conduct his shower; after such time the medical staff member will return and wash the bottom of Mr. Tillman's feet concluding his shower and then provide a stand by assist for transferring from the shower chair to his wheel chair. Mr. Tillman agreed to the plan as it is stated in this in this memo.