SUMMARY OF RECORD REVIEW

In re Caleb H. Rowan (fictional) | Habeas corpus, conditions of confinement | Case No. 26HC00147 | Superior Court of California (fictional venue)

Prepared for: Miriam A. Osei, Attorney at Law, State Bar No. 999507 (fictional) | Prepared by: VdVLaw, Legal Support Services | August 20, 2026

Fictional demonstration matter. Method and format are VDVLAW's actual work product standard; all case facts, persons and identifiers are invented.

1. Purpose

This Summary states what the production reviewed establishes, what it does not establish, and what would resolve the difference, ahead of the informal reply due September 30, 2026. It supports the three-page Case Quick Reference and is supported by the Detailed Source Review and Evidence Audit (document 03), held in the matter file and available on request in whole or in part.

Conservative language is used throughout. Items the record describes but that were not found in the production are described as not located in the production reviewed, never as missing, destroyed or withheld. An incomplete production is an unresolved completeness issue until the custodian confirms what exists; nothing in this review asserts intentional withholding.

2. Controlled case facts

Petitioner	Caleb H. Rowan, CDCR No. BK-4821 (fictional), incarcerated at Redwood Mesa State Prison (fictional)
Proceeding	Habeas corpus, conditions of confinement, Case No. 26HC00147 (fictional). Petition filed March 12, 2025; the State's 31-page informal response filed August 14, 2025; no order to show cause has issued; informal reply due September 30, 2026 (fictional demo setting)
Conditions at issue	Seizure disorder; cervical spine disease with gait impairment; neurogenic bladder with urgency and nocturia; trauma-related mental-health symptoms; housing safety after a reported cellmate assault; a disputed escort incident; grievance access
Counsel	Miriam A. Osei, State Bar No. 999507 (fictional); for respondent, Deputy Attorney General T. Vann (fictional)
Production reviewed	53,015 mapped Bates pages: mental health MH000001-MH006218; medical MED000001-MED042684; Central File and grievances 3,926 pages; court and State materials 187 pages. Media: 16 video, 8 audio, and 46 photograph files, indexed, not reviewed at content level

3. What the record establishes

The following are anchored by clinical, custody, or court records in the production reviewed.

Established point	Record basis
Functional vulnerability	Neurology-confirmed seizure disorder (MED004110-004176); cervical MRI with multilevel degenerative changes (MED011820-011873); urology-documented urgency, nocturia and intermittent incontinence (MED026884-026942); documented falls in 2022, 2024 (twice), and 2026 (MED016201-016274; MED028011-028096; MED041821-041902).
Custody knowledge of restrictions	Lower-bunk and limited-stair codes carried since at least June 2023 (S1 pp. 112-126); accessible-shower restriction added 2024 and renewed March 2026 with the walker (MED041821-041902; S4).
Pre-assault notice	September 2024 threat grievance (G1 pp. 201-229) and a mental-health safety plan documenting cellmate threats and mobility disadvantage (MH004421-MH004449).
The assault and the response	November 11, 2024 reported cellmate assault; medical exam documents bruising and increased cervical pain (MED031447-031489); same-day temporary single occupancy; December 2024 compatible-celling classification with accessibility factors (S2 pp. 233-258; S1 pp. 331-348).
Cross-system clinical communication	Four documented clinician-to-custody communications, April 2024 through February 2026, on housing, sedation and fall risk, and transfer concerns (MH003711-003806; MH004421-004449; MH005102-005138; MH006011-006062).
Continued dispute after the State response	A February 2026 proposed transfer from accessible housing prompted a crisis contact and a classification continuance (MH006011-006062; S1 pp. 522-544), after the August 2025 response described placement as resolved.

4. What the record does not establish

Not established	State of the record
What custody did with the pre-assault notice	Routing, staff review, and compatibility screening before the November 2024 cell assignment are not located in the production reviewed.
The assault investigation outcome	A housing move is documented; the investigation packet, witness statements, findings, and any video-preservation record are not located.
What happened during the March 2025 escort	The RVR finds resistance; the grievance alleges force against a cervical accommodation. The video, body chart, and staff-misconduct outcome are not located; the accounts cannot be reconciled on this record.
The exact accommodation terms	Summary codes exist across systems; the standalone chronos stating terms and active dates are not located. Whether the April 2024 cells complied with the restrictions is unresolved.
Exhaustion on each claim	Final decisions exist for some grievance logs, but delivery proof, complete attachments, and separately routed outcomes are not located for others; exhaustion must be assessed log by log.
Current housing status	The final decision on the 2026 proposed transfer, and the present placement and active restrictions, are not located. The mootness question cannot be resolved without them.
A no-care narrative	The record documents extensive treatment: neurology, imaging, physical therapy, DME, urology, medication management, crisis response. Any theory must run through delay, coordination, and implementation, not absence of care.

5. The claims, issue by issue

The habeas petition challenges conditions of confinement, so this section analyzes issues rather than counts. Each issue states the record support, the State position from the informal response, and what would decide it.

5.1 Coordination and accommodation continuity

Record support: health-care records identify seizure, fall, bladder, and trauma risks; custody records carry accessibility codes across the same period; falls recur, including in 2026. State position: care was extensive and most accommodations remained active. What decides it: the standalone chronos with terms and active dates, and location-level bed history for the April 2024 moves (EP-004, Q-004, Q-005).

5.2 Failure to protect

Record support: specific pre-assault notice in two systems; objective post-assault injury; an emergency housing response. State position: the immediate move and later compatibility review show a reasonable response. What decides it: what custody received and did before the assignment, under the deliberate-indifference framework, which requires that an official knew of and disregarded an excessive risk (Farmer v. Brennan (1994) 511 U.S. 825, 837). The screening and investigation records are the proof either way (EP-001, EP-002, Q-001, Q-002).

5.3 Escort and force

Record support: a provider note recommending modified restraint positioning; an accommodation reference in classification; a grievance and staff-misconduct referral. State position: the RVR found resistance and the complaint was routed separately. What decides it: the video, the body chart, and the misconduct outcome. Recommendation: treat the issue as disputed and keep it severable from the housing claims until the source packet is reviewed (EP-003, Q-003, DEC-003).

5.4 Grievance access and exhaustion

Record support: five key logs traced, with redirects and referrals documented. State position: decisions issued; some claims untimely or unexhausted. What decides it: delivery and receipt records, complete attachments, and the separately routed outcomes, assessed log by log (EP-005, Q-007).

5.5 Mootness and current status

Record support: the 2026 proposed transfer, crisis contact, and classification continuance postdate the State response. State position: current accessible placement resolves the prospective claims. What decides it: the final 2026 housing decision and present placement with active restrictions (EP-006, Q-006). Later records qualifying an earlier mootness position do not establish earlier bad faith, and no such assertion is made.

6. Material not located in the production reviewed

Eight groups are not located; the held audit, section 5, carries the full table with the bearing of each. In brief: pre-assault compatibility screening and routing records (the failure-to-protect notice question); the November 2024 assault investigation packet with video preservation (response adequacy); the March 2025 escort video, body chart, and staff-misconduct outcome (the disputed force facts); standalone accommodation and transport chronos (terms and active dates); complete grievance packets with delivery proof (exhaustion); the final 2026 housing decision with present placement (mootness); scheduling and transport logs for the delayed specialty care (delay causation); and media retention schedules for the 16 video files (whether unproduced media still exists).

Nothing in this list is described as missing or withheld. Each item is not located in the production reviewed, and the request schedule asks the custodian to confirm what exists.

7. Reliability of machine-generated and summary material

The working indexes to the 53,015-page record are search aids built by VdVLaw from the production; every proposition in this Summary carries a Bates or page pinpoint so counsel can verify against the source. No video was viewed, no audio was heard, and no photograph was inspected at full resolution; the 70 media files are indexed only. Copied-forward diagnoses in the clinical record are treated as background unless a contemporaneous note supports them, and clinician statements based on the petitioner's self-report are flagged for cross-checking against custody and incident records (EP-008).

8. Recommended requests, staged

The following sequence is recommended for counsel to accept, modify or reject. Identifiers refer to the request schedule in the held audit; compulsory process and filing decisions remain with counsel.

ID	Request and timing
PR-001	Targeted source-record request to respondent counsel and the institution litigation office, tied to the propositions the informal response places at issue; framed for custodian production under Cal. Rules of Court, rule 4.551(b)(1)(B) if the court's direction is sought. First, now.
PR-002	CCHCS health-record release with a current signed CDCR Form 7385 authorization: accommodation and transport chronos, mental-health housing communications, and identified clinical source records. With PR-001.
PR-003	Non-health records requests: classification chronos, bed history with locations, compatibility screening, the final 2026 housing decision, policies and retention schedules. With PR-001.
PR-004	Assault investigation and escort/use-of-force packets, requesting redacted copies, nonconfidential summaries, disposition information, or versions suitable for court review where material is confidential. After PR-001 framing is set.
PR-005	Complete grievance packets for the five key logs: original submissions, attachments, delivery and receipt records, redirects, appeals, and separately routed outcomes. With PR-003.
PR-006	Preservation request for the 16 video files and related media, with retention-schedule confirmation and, if media is unavailable, the overwrite date and search performed. Now; retention degrades.
PR-007	Policy set: housing and compatibility, disability accommodation and effective communication, use of force and video retention, grievance routing and staff-misconduct referral. Via the public-records route; after PR-001.

9. The working file

Document 03, the Detailed Source Review and Evidence Audit, is held in the matter file and available on request in whole or in part. It contains the production inventory and Bates map, the source registry with what each source can and cannot establish, the evidence problem log (EP-001 through EP-011), the issue analysis, the request schedule (PR-001 through PR-007), the open questions register (Q-001 through Q-008), and the verified authorities. This Summary and the Quick Reference are cut from it; where a fact needs a source, the audit gives the pinpoint.

10. Decisions needed from counsel

ID	Decision
DEC-001	Claim framing: lead with the coordination theory, or with a narrower failure-to-protect theory.
DEC-002	Mootness strategy: whether to address it in the reply now or after the final 2026 housing decision is obtained.
DEC-003	The escort issue: keep separate, include as context, or reserve pending the video and misconduct outcome.
DEC-004	Whether a neurology or physical-medicine expert would materially connect the documented conditions to housing and transport risk.
DEC-005	Whether to request custodian production under rule 4.551(b)(1)(B) now, or first complete the administrative routes in PR-002 through PR-007.

11. Authorities

Authority	Point
Cal. Rules of Court, rule 4.551(b)(1)(B)	Before passing on a superior-court habeas petition, the court may request an informal response from the custodian of a record pertaining to the petitioner's case and direct production of the record or a certified copy; records furnished to the court must be furnished to the petitioner or counsel (rule 4.551(b)(3)).
Cal. Rules of Court, rule 8.385(a)	In an appellate habeas proceeding, the court may order the custodian of any relevant record to produce it before ruling; cited as procedural comparison.
Pen. Code, § 1054.9	Postconviction discovery in qualifying felony-incarceration cases; treated as supplemental only, because eligibility, good-faith-effort, and scope requirements may not fit current conditions-of-confinement records.
Evid. Code, §§ 1043, 1045	Written motion, good cause, and in camera procedure for custodial-officer personnel records; applies only where the item sought is actually a personnel record.
Farmer v. Brennan (1994) 511 U.S. 825, 837	Deliberate indifference requires that the official knew of and disregarded an excessive risk: awareness of facts from which the inference could be drawn, and the drawing of the inference.

Authority verified August 20, 2026 against official or primary sources: the rules against the current Judicial Branch text, the statutes against the codified text, and the Farmer pinpoint and parallels against published opinions. Full parallel citations appear in the table of authorities in the held audit. Demonstration copy: re-verify before any filing use.

Status of this document

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Methodology and limitations

AI tools assisted with organization, indexing, cross-referencing, and drafting. The review was directed by VdVLaw, which specified the sources and the comparisons and required source-grounded results. No video was viewed, no audio was heard, and no photograph was inspected at full resolution; media files are indexed only. Assertions were cross-checked internally against the production but were not re-verified line by line. Original records and media control over every statement in this document. This demonstration copy is built on a fully fictional record.