DETAILED SOURCE REVIEW AND EVIDENCE AUDIT

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

Counsel copy, provided on request | 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.

Reading guide

This audit is the working file behind the delivered Summary and Quick Reference. Section 1 inventories the production and maps the ranges used. Section 2 is the source registry, with what each source can and cannot establish. Section 3 is the evidence problem log, EP-001 onward. Section 4 analyzes the issues. Section 5 lists material not located in the production reviewed. Section 6 reconciles the media inventories. Section 7 is the open questions register. Section 8 is the request schedule. Section 9 is the table of authorities. Section 10 collects the questions for counsel.

Identifiers are stable and are never renumbered. "Not located in the production reviewed" means exactly that; it is not a finding that an item is missing, destroyed or withheld, and no assertion of intentional withholding is made anywhere in this file.

1. Production inventory and range map

Category	Produced	Note
Mental health	6,218 pages (MH000001-MH006218)	Psychiatry, psychology, IDTT, crisis, safety plans, medication (412-page MAR extract), crisis/observation packet (188 pages).
Medical	42,684 pages (MED000001-MED042684)	Progress notes, nursing, specialty, imaging, labs, medications, DME; 1,284 embedded outside-specialty pages; 386 DME/accommodation pages.
Central File and grievances	3,926 pages	Classification/housing 1,104 (S1); discipline/incident 611 (S2); movement/transport 463 (S3); disability/accommodation 400 (S4); grievances/appeals 1,348 (G1).
Court and State	187 pages (CRT)	Petition materials and the 31-page informal response of August 14, 2025 with selected exhibits.
Media	70 files (AV)	16 video, 8 audio, 46 photographs. Indexed only; not reviewed at content level.

Pinpoints used in this review: threat grievance G1 pp. 201-229; assault records S2 pp. 233-258 and G1 pp. 308-341; post-assault classification S1 pp. 331-348; escort incident S2 pp. 401-429; 2026 continuance S1 pp. 522-544; clinical pinpoints as carried in the registry rows and chronologies. Total mapped: 53,015 pages. Citation shorthand: CF is the aggregate citation for the Central File sets S1 through S4 and G1; a specific set is cited wherever a single set carries the point.

2. Source registry

ID	Source	Can establish	Cannot establish
MH	Mental-health production (6,218 pages)	Trauma and depression history; 2022 cutting episode; safety plans; the Sept. 2024 threat safety plan (MH004421-004449); four clinician-to-custody communications 2024-2026; Feb. 2026 crisis contact (MH006011-006062).	Cannot establish: that clinicians ordered permanent single-cell housing (they recommended stability and compatibility); continuous severe symptoms (long stable stretches documented); facts based only on self-report without cross-check (EP-008).
MED	Medical production (42,684 pages)	Seizure disorder (MED004110-004176); cervical MRI (MED011820-011873); urology urgency (MED026884-026942); falls 2022, 2024, 2026; post-assault injury exam (MED031447-031489); dizziness and fall-precaution note (MED034102-034166); 2026 walker and shower renewal (MED041821-041902).	Cannot establish: uncontrolled epilepsy (intermittent risk is the supported framing); acute cord compression (degenerative findings only); catheter-level bladder need; the cause of each specialty delay (logs not located, EP-007).
S1	Classification and housing (1,104 pages)	Lower-bunk and limited-stair codes since June 2023 (pp. 112-126); Dec. 2024 compatible-celling classification (pp. 331-348); Feb. 2026 transfer continuance (pp. 522-544).	Cannot establish: what compatibility screening preceded the Nov. 2024 assignment (EP-001); the final 2026 decision (EP-006); whether April 2024 cells met the restrictions (EP-010).
S2	Discipline and incident (611 pages)	The assault incident index (pp. 233-258); the Mar. 2025 escort RVR with resistance finding (pp. 401-429); 2023 refusal-to-cell and 2024 property-damage RVRs.	Cannot establish: the assault investigation outcome (EP-002); what the escort video shows (EP-003).
S3	Movement and transport (463 pages)	Bed history and move records, including the two April 2024 moves (pp. 88-103).	Cannot establish: whether accessible routes were considered in the April 2024 moves; transport reasons for cancelled specialty trips.
S4	Disability and accommodation (400 pages)	Accommodation summaries: lower bunk, limited stairs, devices, accessible shower, a 2025 transport-restraint reference (pp. 188-221).	Cannot establish: the exact terms and active dates of each restriction; the standalone chronos are not in the set (EP-004).

ID	Source	Can establish	Cannot establish
G1	Grievances and appeals (1,348 pages)	Five key logs: RM-24-4412 (threat), RM-24-5088 (assault), RM-25-0771 (accessible housing), RM-25-1024 (escort), RM-26-0316 (2026 transfer, pending).	Cannot establish: delivery and receipt for the disputed logs; complete attachments; the separately routed staff-misconduct outcome (EP-005).
CRT	Court and State materials (187 pages)	The State's positions: extensive care, post-assault response, exhaustion defenses, mootness from current placement, and the assertion that no record production is available before an OSC. Three orders under rule 4.551(i) (October 2, 2025; February 5, 2026; June 4, 2026) extending, for good cause stated, the time for the reply to the informal response and the court's time to act; current reply deadline September 30, 2026.	Cannot establish: the factual propositions themselves; several rest on selected summary or outcome exhibits whose sources are not located in the production reviewed (EP-013); the categorical prematurity assertion is broader than the text of rule 4.551(b)(1)(B).
AV	Media (70 files)	Existence and general subject of the files from the index.	Nothing established from content: not viewed or heard (EP-009).

3. Evidence problem log

ID	Defect	Why it matters	What would resolve it
EP-001	Compatibility screening and routing records preceding the November 2024 cell assignment are not located (S1; G1).	The failure-to-protect notice question turns on what custody received and did before the assignment.	Screening documents, enemy/separation checks, routing logs (PR-001, PR-003).
EP-002	The November 2024 assault investigation packet and video-preservation log are not located (S2; G1).	A housing move proves action, not the completeness or result of the investigation.	Incident reports, interviews, findings, closure, preservation record (PR-004, PR-006).
EP-003	The March 2025 escort video, body chart, and staff-misconduct outcome are not located (S2; G1).	Competing accounts (resistance against force despite a cervical accommodation) cannot be resolved.	Video, UOF packet, body chart, misconduct disposition (PR-004, PR-006).
EP-004	Standalone accommodation and transport chronos are not located; only summary codes appear (S4; MED).	Terms and active dates are needed before alleging any violation of a restriction.	Source chronos via the health-records route (PR-002).
EP-005	Delivery proof, complete attachments, and separately routed outcomes are not located for several grievance logs (G1).	Exhaustion and availability must be assessed log by log; timeliness disputes turn on delivery records.	Complete packets with proof of delivery (PR-005).
EP-006	The final decision on the February 2026 proposed transfer, and present placement, are not located (S1; CRT).	The State's mootness position cannot be evaluated without current-status source records.	Final committee decision and bed record (PR-001, PR-003).
EP-007	Scheduling, cancellation, and transport logs for the delayed specialty care are not located (MED).	A 124-day neurology follow-up and a cancelled imaging trip cannot be attributed to a cause.	Scheduling and transport logs (PR-003).

ID	Defect	Why it matters	What would resolve it
EP-008	Copied-forward diagnoses and self-report-based clinician statements appear in the clinical record (MH).	Quoting them as independent findings would overstate the record.	Contemporaneous-note check, done in the working file; cross-checks against custody records where flagged.
EP-009	The 70 media files are indexed only; none reviewed at content level (AV).	No statement in the package may rest on media content.	Media review only on counsel direction; preservation first (PR-006).
EP-010	The two April 2024 moves lack documentation that accessible-route and lower-tier restrictions were considered (S3; MED).	The moves coincide with two documented falls; implementation is the issue.	Bed-location records against restriction codes (PR-003; Q-005).
EP-011	Three short medication gaps appear around transfers; two show prompt re-ordering, one is unresolved (MH; MED).	A gaps theory must separate interruption from tapering or documented refusal.	MAR detail for the unresolved gap (PR-002).
EP-012	The State's escort-grievance exhibit states that a separate staff-misconduct response would be provided; that response is not located (G1; CRT).	The State's own exhibit identifies an outcome record that the production does not contain.	The separately routed disposition and any notice provided (PR-004).
EP-013	The informal response relies on selected exhibits; the nonprivileged source records cited, summarized, referenced, or necessary to substantiate its identified factual assertions are not located in the production reviewed (CRT).	Summary exhibits cannot be tested without the sources behind them; selection is a completeness issue, not an accusation.	The narrowed source set (PR-001; Q-009).

4. Issue analysis

Conditions-of-confinement habeas: issues replace counts. Each issue gives the petitioner use and the State testing point.

Issue 1: Coordination and accommodation continuity

Element	Petitioner use	State testing point
Known functional risk	Seizures, falls, gait, bladder, trauma documented across MED and MH; codes carried in S1/S4.	Extensive care and long-standing accommodations; functional status varies by date.
Implementation	Falls recur during and after moves; 2026 fall with renewed restrictions; EP-010 moves.	Most moves compliant; chrono terms not yet in evidence either way (EP-004).

Issue 2: Failure to protect

Element	Petitioner use	State testing point
Subjective knowledge of risk	Threat grievance plus clinical safety plan, both September 2024; mobility disadvantage documented (Farmer v. Brennan (1994) 511 U.S. 825, 837).	Knowledge of a specific assailant risk requires the screening records; notice documents alone do not show what reached the decision-maker (EP-001).
Response	Injury documented; investigation completeness unknown (EP-002).	Same-day move and December compatibility classification; a refused cellmate in 2023 bears on feasibility.

Issue 3: Escort and force

Element	Petitioner use	State testing point
Accommodation and force	Provider restraint-modification note; grievance account; misconduct referral.	RVR resistance finding; no video or body chart in evidence for either side (EP-003).

Issue 4: Grievance access and exhaustion

Element	Petitioner use	State testing point
Availability and completion	Redirects and separate routing complicate completion on three logs (EP-005).	Multiple final decisions issued; appeals were available and sometimes used.

Issue 5: Mootness and current status

Element	Petitioner use	State testing point
Prospective relief	2026 proposed transfer and continuance postdate the response (EP-006).	Accessible placement was in place at filing; the final decision may confirm it.

Issue 6: The State's prematurity position

The informal response asserts that no record production or discovery is available before an OSC. The State may be correct that ordinary discovery has not opened; the categorical form of the assertion is too broad. Rule 4.551 recognizes the informal-response stage as a pre-OSC stage, subdivision (b)(1)(B) authorizes the court to direct a custodian to produce a record or certified copy before passing on the petition, and subdivision (b)(3) requires records furnished to the court to be furnished to the petitioner. The rule does not create a general right to pre-OSC discovery; the recommended posture is therefore targeted, court-directed custodian production tied to the response's own assertions. Pen. Code, § 1054.9 was evaluated and set aside for this record: its discovery materials are defined by trial entitlement and favorable-material terms, with a trial-counsel good-faith prerequisite, and current conditions records do not fit that definition merely because respondent counsel possesses them. The AB 1036 amendment (effective January 1, 2026, after the response was filed) is noted for completeness only.

Suggested framing for counsel (recommendation)

Suggested filing title: Petitioner's Request for Order Directing Production of Records from Custodians Under California Rules of Court, Rule 4.551(b)(1)(B), with Protective-Order and In Camera Provisions, and for Extension of Time to Reply Under Rule 4.551(i).

Suggested argument core, for counsel to accept, modify or reject: the request is not general pre-OSC discovery; it is targeted production of narrowly identified source records that the respondent's informal response itself places at issue. Rule 4.551(b)(1)(B) authorizes the court, before passing on the petition, to request an informal response from the custodian of any record pertaining to the petitioner's case and to direct production of the record or a certified copy. To the extent any responsive record is confidential, security-sensitive, investigative, personnel-related, or health-related, the request seeks redacted production, nonconfidential summaries, a privilege and exemption log, protective-order or attorney-eyes-only production, or in camera review, with Evid. Code, §§ 1043 and 1045 procedures where personnel records are actually implicated.

5. Material not located in the production reviewed

Item	Bearing on the case
Pre-assault compatibility screening and routing records	The notice-and-response core of the failure-to-protect issue (EP-001).

Item	Bearing on the case
November 2024 assault investigation packet; video preservation	Response adequacy and any preserved media (EP-002).
March 2025 escort video, body chart, staff-misconduct outcome	The disputed force and accommodation facts (EP-003).
Standalone accommodation and transport chronos	Terms and active dates of each restriction (EP-004).
Complete grievance packets with delivery proof	Exhaustion and availability, log by log (EP-005).
Final 2026 housing decision and present placement	The mootness question (EP-006).
Scheduling, cancellation, and transport logs	Causation for the specialty delays (EP-007).
Media retention schedules, produced and referenced video	Whether referenced but unlocated media still exists and until when (EP-009).

Nothing in this table 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. If a targeted request later establishes that an identified record exists, is within the State's control, is material, and is not produced without adequate explanation, counsel can reassess the wording on that developed record.

6. Media inventories, reconciled

Type	Produced	What the records imply	State
Video	16 files	Incident indexes reference body-worn and fixed-camera coverage for the assault aftermath and the escort event.	The escort and assault-scene files referenced in S2 are not among the produced 16; reconciliation is open (Q-002, Q-003). None viewed.
Audio	8 files	Interview and radio references appear in incident summaries.	None heard; no proposition rests on audio content.
Photographs	46 files	Index covers housing areas, body-chart photography references, and scene context.	None inspected at full resolution; body-chart photographs for the escort event not located.
Working indexes	53,015 pages mapped	VdVLaw-built search aids over the four productions.	Search aids only; the Bates page is the citation, never the index.

7. Open questions register

ID	Question	Route to resolution
Q-001	What compatibility screening occurred before the November 2024 cell assignment, and what did the screeners know?	Screening and routing records (PR-001, PR-003).
Q-002	What did the assault investigation find, and was video preserved?	Investigation packet and preservation log (PR-004, PR-006).
Q-003	What does the escort video show, and what was the staff-misconduct outcome?	Video, UOF packet, disposition (PR-004, PR-006).
Q-004	What are the exact terms and active dates of each accommodation chrono?	Standalone chronos (PR-002).
Q-005	Were the April 2024 cells compliant with the lower-tier and accessible-route restrictions?	Bed-location records against codes (PR-003).
Q-006	What is the final 2026 housing decision, and what is the present placement?	Committee decision and bed record (PR-001, PR-003).
Q-007	Do delivery records support timeliness and completion on the disputed grievance logs?	Complete packets with delivery proof (PR-005).
Q-008	What caused the 124-day neurology follow-up and the cancelled imaging transport?	Scheduling and transport logs (PR-003).
Q-009	What nonprivileged source records were cited, summarized, referenced, or necessary to substantiate the identified factual assertions in the informal response?	The narrowed source set (PR-001; EP-013).

8. Request schedule

ID	Recipient	Records sought	Channel, authority, mechanics
PR-001	Respondent counsel and institution litigation office (fictional)	Source records behind the informal response: final 2026 housing decision, screening records, investigation and escort packets, grievance sources.	Channel: targeted letter tied to the response's factual propositions, including the nonprivileged source records cited, summarized, referenced, or necessary to substantiate them; court framing under Cal. Rules of Court, rule 4.551(b)(1)(B) if counsel seeks the court's direction. Urgency: first, now; the reply date controls.
PR-002	CCHCS health-records office	Accommodation and transport chronos; mental-health housing communications; MAR detail for the unresolved gap; identified clinical source records.	Channel: CCHCS release-of-information process with a current signed CDCR Form 7385, categories and date range limited to need. Urgency: with PR-001.
PR-003	Institution records / classification (fictional)	Committee chronos, bed history with locations, compatibility screening, scheduling and transport logs, final 2026 decision.	Channel: non-health records request; source records, not summary screens. Urgency: with PR-001.
PR-004	Institution litigation / investigations (fictional)	Assault investigation packet; escort UOF packet with video and body chart; staff-misconduct disposition.	Channel: request the complete records, including confidential records where legally permitted; where anything is withheld, request redacted copies, nonconfidential summaries, disposition data, a privilege and exemption log, protective-order or attorney-eyes-only production, or in camera review. Evid. Code, §§ 1043, 1045 procedure only if actual personnel records are sought. Urgency: after PR-001 framing.
PR-005	Grievance office / Office of Appeals (fictional)	Complete packets for RM-24-4412, RM-24-5088, RM-25-0771, RM-25-1024, RM-26-0316: submissions, attachments, delivery records, redirects, appeals, separate closures.	Channel: grievance records request through counsel. Urgency: with PR-003.

ID	Recipient	Records sought	Channel, authority, mechanics
PR-006	Institution custodian of media (fictional)	Preservation of the 16 produced video files and of any referenced but unlocated assault, escort, body-worn, or fixed-camera video and related media; retention schedules; if any item is unavailable, whether it existed, the retention period, the overwrite date, and the search performed.	Channel: preservation letter. Urgency: now; retention degrades.
PR-007	CDCR public-records route	Housing and compatibility policy; disability and effective-communication procedures; UOF and video-retention policy; grievance routing and misconduct-referral procedures.	Channel: public-records request. Urgency: after PR-001; published policy may satisfy some items.

9. Table of authorities

Alphabetical by case, then rules and statutes. Full formal citations with parallel reporters where they exist; short form with the pinpoint in running text. 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 case pinpoint and parallels against published opinions. Demonstration copy: re-verify before any filing use.

Authority	Proposition
Farmer v. Brennan (1994) 511 U.S. 825, 837 [114 S.Ct. 1970, 128 L.Ed.2d 811]	Deliberate indifference requires subjective knowledge: awareness of facts from which the inference of excessive risk could be drawn, and the drawing of the inference.
In re Allison (1967) 66 Cal.2d 282, 285 [57 Cal.Rptr. 593, 425 P.2d 193]	Habeas corpus is available to vindicate the rights of a person lawfully confined; California foundation for the conditions claims.
In re Dexter (1979) 25 Cal.3d 921, 925 [160 Cal.Rptr. 118, 603 P.2d 35]	A habeas petitioner ordinarily must exhaust available administrative remedies; frames the grievance and exhaustion issue on both sides.
Cal. Rules of Court, rule 4.550	The superior-court habeas rules apply to proceedings for relief from unlawful confinement or unlawful conditions of confinement.
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 any record pertaining to the petitioner's case and direct production of the record or a certified copy.
Cal. Rules of Court, rule 4.551(b)(3)	Every record furnished to the court must be furnished to the petitioner or counsel.
Cal. Rules of Court, rule 8.385(a)	Appellate habeas: the court may order the custodian of any relevant record to produce it before ruling.
Evid. Code, § 1043	Written motion, identification, and good-cause requirements for custodial-officer personnel records.
Evid. Code, § 1045	Relevance, in camera examination, exclusions, and protective limits for such records.
Pen. Code, § 1054.9 (as amended by Stats. 2025, ch. 444 (AB 1036), eff. Jan. 1, 2026)	Evaluated, not relied on: discovery materials are defined by trial entitlement and favorable-material terms, with a trial-counsel good-faith prerequisite, so current conditions records do not fit. The amendment adding habeas respondent counsel to the prosecution postdates the State's August 2025 response and is noted only.

10. Questions for counsel

DEC-001: claim framing, coordination theory against a narrower failure-to-protect lead. DEC-002: mootness timing, reply now or after the final 2026 decision. DEC-003: the escort issue, separate, context, or reserved. 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 rule 4.551(b)(1)(B) custodian production now or complete the administrative routes first. DEC-006: whether to seek an extension of the reply date for good cause if production is ordered or delayed. Each is a recommendation for counsel to accept, modify or reject.

Status of this document

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Methodology and limitations

AI tools assisted with organization, indexing, cross-referencing, and drafting, 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; the registry marks those limits source by source. Assertions were cross-checked internally but not re-verified line by line. Original records and media control. This demonstration copy is built on a fully fictional record.