CASE QUICK REFERENCE In re Caleb H. Rowan (fictional)

Habeas corpus, conditions of confinement | Case No. 26HC00147 | Fictional demonstration matter. Method and format are VDVLAW's actual work product standard; all case facts, persons and identifiers are invented.

NEXT COURT EVENT (FICTIONAL DEMO SETTING): Informal reply due Wednesday, September 30, 2026, Superior Court of California (fictional venue)

NEW IN THIS REVIEW

1. The State's mootness position predates 2026: a proposed move from the accessible unit was continued, and the final decision is not located (CF; CRT).
2. Pre-assault notice is documented twice, in the grievance and mental-health systems; the compatibility screening that followed is not located (EP-001).
3. The Nov. 2024 assault has objective injury (MED031447-031489) and a same-day move; no investigation packet or video-preservation log is produced (EP-002).
4. The Mar. 2025 escort dispute is unresolvable: RVR and grievance exist; video, body chart, and misconduct outcome not located (EP-003).
5. Accommodations appear as summary codes; the standalone chronos with terms and active dates are not located (EP-004).

DECISION QUESTION FOR COUNSEL

Whether to frame the reply around the coordination theory and request custodian production under Cal. Rules of Court, rule 4.551(b)(1)(B). For counsel to accept, modify or reject (DEC-001, DEC-005).

CLAIMS AND CURRENT POSTURE

Claim	Record support	State position	Not established
Coordination / accommodation continuity	Accessibility codes since 2021; falls documented through 2026 (MED; CF).	Extensive care; most accommodations active.	**Chrono terms and dates; April 2024 cell compliance (EP-004).**
Failure to protect (Nov. 2024 assault)	Notice twice documented; objective injury; emergency single occupancy (G1; MH; MED).	Immediate post-assault move and compatibility review.	**Pre-assault screening; investigation findings; video (EP-001, EP-002).**
Escort / force (Mar. 2025)	Cervical accommodation reference; RVR; grievance; misconduct referral (CF; MED).	RVR found resistance; complaint routed separately.	**Video; body chart; misconduct outcome (EP-003).**
Grievance access / exhaustion	Five key logs traced; redirects and referrals documented (G1).	Decisions issued; some claims untimely or unexhausted.	**Delivery proof; attachments; separate outcomes (EP-005).**
Mootness / current status	2026 clinical concern and continuance postdate the State response (MH; CF).	Current accessible placement resolves prospective claims.	**Final 2026 decision; present placement (EP-006).**

CASE SNAPSHOT

Petitioner	Caleb H. Rowan, CDCR No. BK-4821, Redwood Mesa State Prison (fictional)
Case number	26HC00147, Superior Court of California (fictional venue)
Filings	Petition Mar. 12, 2025; State informal response (31 pp.) Aug. 14, 2025 (fictional)
Next event	Informal reply due September 30, 2026 (fictional demo setting)
Conditions at issue	Seizures; gait impairment; neurogenic bladder; PTSD; housing safety; grievance access
Production reviewed	53,015 mapped pages (MH 6,218; MED 42,684; CF 3,926; CRT 187); 70 media files
Counsel	Miriam A. Osei, SBN 999507; respondent, DAG T. Vann (both fictional)

POINTS ON EACH SIDE

Petitioner points	Respondent points
1. Pre-assault notice in both grievance and mental-health systems (G1; MH). **2.** Objective post-assault injury and an emergency housing move (MED; CF). **3.** Accessibility codes plus documented falls through 2026 (MED; CF). **4.** The 2026 move proposal and continuance postdate the mootness position (CF; MH). **5.** Clinician housing communications crossed to custody four times (MH).	**1.** Care is extensive: neurology, imaging, PT, DME, urology (MED). **2.** Same-day post-assault move; Dec. 2024 compatibility classification (CF). **3.** A 2023 RVR shows a refused compatible cellmate (CF). **4.** Grievances were processed with appeals available; several completed (G1). **5.** Most specialty referrals completed; PT started within weeks (MED).

ITEMS TO CONFIRM BEFORE THE REPLY IS FILED

[ ] Final 2026 housing decision and present placement	[ ] Pre-assault compatibility screening records
[ ] Assault investigation packet; video preservation	[ ] Escort video; body chart; misconduct outcome
[ ] Standalone accommodation and transport chronos	[ ] Grievance delivery proof; complete attachments
[ ] Scheduling and transport logs (specialty delays)	[ ] Media retention schedule (16 video files)

CONFERENCE NOTES

Respondent position	Petitioner response	Court direction / next date