

No. 25A347

In the Supreme Court of the United States

JOHN Q. HAMM,
COMMISSIONER, ALABAMA DEPARTMENT OF CORRECTIONS,
Applicant,

v.

MICHAEL SOCKWELL,
Respondent.

**SUPPLEMENTAL APPENDIX TO SOCKWELL'S
OPPOSITION TO THE GOVERNMENT'S EMERGENCY
APPLICATION FOR STAY**

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CONTENTS OF APPENDIX

Declaration of Jerilyn Bell	1
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No. 23-13321-P

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

MICHAEL SOCKWELL,
Appellant,

v.

COMMISSIONER, ALABAMA DEPARTMENT OF CORRECTIONS,
Appellee.

Appeal from the United States District Court, Middle District of
Alabama, Case No. 2:13-CV-913-WKW-SRW
The Honorable W. Keith Watkins

DECLARATION OF JERILYN BELL

Pursuant to 28 U.S.C. § 1746, Jerilyn Bell declares as follows:

1. I am a Senior Trial Attorney at the Georgia Capital Defenders Office in Atlanta, Georgia. I respectfully submit this declaration in support of Michael Sockwell's opposition to the government's motion to stay the mandate pending a petition for writ of certiorari. I have made the statements below based on personal knowledge through my observations of, and conversations with, Mr. Sockwell. My statements are true and correct to the best of my knowledge, information, and belief.

2. I have known and represented Michael Sockwell for approximately 25 years. I have visited him at the William C. Holman Correctional Facility, where he is incarcerated, on numerous occasions. I last visited him on August 20, 2025.

3. Mr. Sockwell's physical and mental condition has deteriorated substantially since I first met him. When I first visited Mr. Sockwell in the early 2000s, he had already suffered a stroke in prison but could walk on his own, discuss his case, and eat a full meal provided in the visiting area. Since that time, Mr. Sockwell has been hospitalized several times for a variety of medical ailments. By 2022, he was confined to a wheelchair and required an aide or officer to push him around.

4. On April 30, 2023, at 60 years old, Mr. Sockwell was admitted to the hospital with an infection in his left leg. His left leg was amputated. Mr. Sockwell now lives in the infirmary permanently.

5. Based on my first-hand observations, as of August 20, 2025, Mr. Sockwell's current physical condition is as follows:

- a. He is bedridden. He could not turn his head from left to right to acknowledge my presence; he could only move his eyes. He could not sit up, roll himself over, or adjust

the angle of his head without assistance. I had to lean over his hospital bed to hear his words.

- b. Mr. Sockwell is unable to move his fingers. As a result, he is unable to feed himself.
 - c. Mr. Sockwell is incapable of self-care. He is entirely reliant on the care of others. He is incontinent and has a colostomy bag. He cannot clean himself.
6. Mr. Sockwell's current mental condition is as follows:
- a. He has extreme difficulty speaking, and it is challenging to hold a conversation with him. He understands what I am saying, but it takes time and effort for him to formulate his responses. He often becomes exhausted by the effort and falls asleep while we are meeting.
 - b. He is unable to describe his own current condition, pain level, or needs beyond one word. I asked how he was feeling and Mr. Sockwell responded with the words "hungry" and "pain."

I affirm this 25th day of August, 2025, under penalty of perjury under the laws of the United States of America, that the foregoing is true and correct.

Executed on August 25, 2025.

/s/ Jerilyn Bell
Jerilyn Bell
Sr. Trial Attorney
Georgia Capital Defenders Office