

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
CENTRAL DIVISION

JAMIE LAMBERTZ-BRINKMAN, LAURA)
RIVERA, CHRISTA STORK and Jane Does 4)
through 10, on behalf of themselves and all)
others similarly situated.)
Plaintiffs,)

Civ. No. 07-3040

vs.)

**JOINT MOTION FOR APPROVAL OF
STIPULATION AND SETTLEMENT
AGREEMENT**

DENNY KAEMINGK, SECRETARY OF)
THE SOUTH DAKOTA DEPARTMENT OF)
CORRECTIONS, BRENDA HYDE,)
WARDEN OF THE SOUTH DAKOTA)
WOMEN’S PRISON, TANYA REISER,)
CLINICAL SUPERVISOR FOR)
CORRECTIONAL HEALTH SERVICES AT)
THE SOUTH DAKOTA WOMEN’S)
PRISON, AND JOHN DOE DEFENDANTS,)
Defendants.)

Class representatives Jamie Lambertz-Brinkman and Christa Stork, and Defendants
Denny Kaemingk, Brenda Hyde, and Tanya Reiser, hereby jointly move for approval of a
Stipulation and Settlement Agreement pursuant to Rule 23(e).

The grounds for this motion are more fully set forth in Plaintiffs’ Memorandum of Points
and Authorities filed herewith. Also filed along with this Motion are the following:

Exhibit 1 - Stipulation and Settlement Agreement;

Exhibit 2 - Preliminary Order Establishing Date for Fairness Hearing and Ordering Notice
to class members.

Exhibit 3 - Notice of Proposed Class Action Settlement and Fairness Hearing; and

Exhibit 4 - Affidavit of Mike Abourezk in Support of Motion for Approval of Proposed Class Action Settlement.

Exhibit 5 - Proposed Order Approving Class Action Settlement and Consent Decree.

The parties ask that the Court conduct a fairness hearing pursuant to Rule 23(e), and that the Court determine the proposed settlement is fair and equitable to class members.

Plaintiffs' counsel is authorized to state that Defendants join in this motion.

Dated this 24th day of February, 2012.

By: /s/ Mike Abourezk
Mike Abourezk
ABOUREZK LAW FIRM

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 24th of February, 2012, he electronically filed and served a true and correct copy of the foregoing **Joint Motion for Approval of Stipulation and Settlement Agreement** document to:

Mike Shaw
Patrick Grode
May, Adam, Gerdes & Thompson
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Pierre SD 57501

By: /s/ Mike Abourezk
Mike Abourezk
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