

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARCUS BARNES, <i>et al.</i> ,)	
individually and on behalf of all others)	
similarly situated,)	No. 20-cv-2137
)	
Plaintiffs,)	
)	
v.)	Judge Virginia Kendall
)	
ROB JEFFREYS, in his official)	
capacity as the Director of the Illinois)	
Department of Corrections,)	
)	
Defendant.)	

**DEFENDANT’S RESPONSE TO PLAINTIFFS’ AMENDED MOTION FOR
CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL**

Plaintiffs in this case have moved for certification of a class pursuant to Federal Rule of Civil Procedure 23(b)(2), with that class defined as follows:

All individuals who have been convicted of sex offenses and completed their court-imposed sentence of incarceration who cannot find housing that complies with 730 ILCS 5/3-3-7(a)(7.6) at which to reside while on Mandatory Supervised Release.

Plaintiffs’ Amended Motion for Class Certification, Dkt. 24-2, at 1.

Defendant Rob Jeffreys, Director of the Illinois Department of Corrections, does not oppose certification of a class as defined above. Further, Defendant does not oppose appointment of Adele Nicholas and Mark Weinberg as class counsel.

Respectfully submitted,

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