

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

JEFFERY PRESLEY, et al.,
8
Plaintiffs,

v.

No. 4:05-CV-00148

CHRISTOPHER EPPS, et al.,

Defendants.

**PLAINTIFFS' MOTION FOR CIVIL CONTEMPT SANCTIONS
AND FOR OTHER EQUITABLE RELIEF
TO COMPEL DEFENDANTS' COMPLIANCE
WITH CONSENT DECREE PROVISIONS
ON MEDICAL AND MENTAL HEALTH CARE**

EXPEDITED EVIDENTIARY HEARING REQUESTED

Plaintiffs, by and through their counsel, hereby respectfully request that the Court hold Defendants in civil contempt of the April 28, 2006 Consent Decree after an evidentiary hearing, and direct that Defendants purge themselves of the contempt by promptly accomplishing the following:

Resolve medical staffing shortages;

Suspend prisoner co-pay charges;

Separate prisoners with mental illness from the other prisoners on Unit 32;

Assign a qualified full-time mental health care provider to Unit 42 (the MSP in-patient unit);

Cease the use of special management isolation cells to manage psychiatric crises; and

In collaboration with Plaintiffs and their experts, formulate meaningful corrective action plans for each of the deficiencies identified in the experts' audit reports, setting forth specific tasks; assigning responsibility for implementation; identifying the key individual responsible for each aspect of implementation; identifying the resources that will be required for implementation; and laying out an unambiguous time-line for implementation.

Plaintiffs further request that the Court order Defendants to pay Plaintiffs' reasonable litigation costs, experts' fees and attorneys' fees; and that the Court order such further equitable relief as necessary to enforce compliance with the Consent Decree and to provide Plaintiffs constitutionally adequate medical and mental health care.

Plaintiffs seek an expedited evidentiary hearing.

The points and authorities supporting this Motion are set forth in the Memorandum and the Declaration of Margaret Winter, with exhibits, filed herewith.

Respectfully submitted,

_____/s/_____
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