

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT  
OF ALABAMA, NORTHERN DIVISION

<b>ALABAMA DISABILITIES ADVOCACY PROGRAM,</b>	)	
	)	
Plaintiff,	)	Civil Action No.
v.	)	
	)	CV 2013-519
<b>SAFETYNET YOUTHCARE, INC.,</b>	)	
	)	
Defendant.	)	
	)	
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<b>SAFETYNET YOUTHCARE, INC.,</b>	)	
	)	
Third-Party Plaintiff,	)	Civil Action No.
v.	)	
	)	CV 2013-519
<b>ALABAMA DEPARTMENT OF HUMAN RESOURCE</b>	)	
	)	
Third-Party Defendant.	)	
	)	
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**MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, **Defendant/Counter-Plaintiff**, SafetyNet Youthcare, Inc. ("SafetyNet"), hereby moves this Court for an order granting summary judgment in SafetyNet's favor and against Plaintiff Alabama Disabilities Advocacy Program ("ADAP").

There is no genuine dispute as to any material fact, and SafetyNet is entitled to judgment as a matter of law. In support of this Motion, SafetyNet relies upon its Memorandum Brief in Support of Summary Judgment and Evidentiary Submission filed contemporaneously herewith.

/s/ Martha Leach Thompson  
 Martha Leach Thompson  
 Stewart W. McCloud  
 Attorneys for Defendant,  
 SafetyNet Youthcare, Inc.

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2014, I have electronically filed the foregoing pleading with the Clerk of the Court which will send notification of the filing to:

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Luther Strange  
Felicia Brooks  
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