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

ALABAMA DISABILITIES ADVOCACY PROGRAM, Plaintiff,

VS.

SAFETYNET YOUTHCARE, INC., Defendant.

CIVIL ACTION NO. 13-0519-CG-B

SAFETYNET YOUTHCARE, INC., Third Party Plaintiff,

VS.

ALABAMA DEPARTMENT OF HUMAN RESOURCES, Third Party Defendant.

## MONITORING, VISITATION AND RECORD ACCESS PROCEDURES FOR SAFETYNET YOUTHCARE, INC. (SAFETYNET) FACILITIES

COME NOW, the Plaintiff (ADAP) and Defendant, SafetyNet and pursuant to this Court's December 12, 2014 Order (Doc. No. 78) hereby notice and confirm that they have met and agreed to a protocol for ADAP's access to all SafetyNet facilities, attached as Exhibit A. SafetyNet has consented to the filing of this protocol by ADAP. As the Court has not required the Third-Party Defendant, the Alabama Department of Human Resources (DHR), to participate in the protocol between ADAP and SafetyNet, DHR will receive a copy of this protocol as a party to this litigation.

## Respectfully Submitted,

Dated: January 30, 2015

Signature: /s/Martha L. Thompson (BY CONSENT)

Martha Leach Thompson, Esq.

Stewart McCloud, Esq. Attorneys for Defendant, SafetyNet Youthcare, Inc.

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COUNSEL FOR THE

**PLAINTIFF** 

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 30, 2015, I have served on Third-Party Defendant's counsel below in this matter by filing via CM/ECF system with the Court, email, and U.S. mail.

Felicia M. Brooks, Deputy Attorney General Attorney for Third-Party-Defendant, State of Alabama Department of Human Resources P.O. Box 304000 Montgomery, Alabama 36130-4000 Telephone: (334) 242-9330

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/s/Andrea J. Mixson One of Attorneys for Plaintiff