

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DON LIPPERT, et al.,)	
)	
Plaintiffs,)	No. 10-cv-4603
v.)	
)	Judge Jorge L. Alonso
ROB JEFFREYS, et al.,)	Magistrate Judge Susan E. Cox
)	
Defendants.)	

JOINT MOTION FOR ENTRY OF IMPLEMENTATION PLAN

Pursuant to Section IV.C of the Consent Decree, Plaintiffs and Defendants, by their attorneys, hereby move the Court to enter the first Implementation Plan in this matter, stating as follows:

1. Section IV of the Consent Decree provides for the creation of an Implementation Plan which “shall be incorporated into, and become enforceable as part of this Decree.” Dkt. 1557 at 18-19. On February 21, 2023, the Court entered an Order concerning Defendants’ proposed Plan. Dkt. 1612. This Order directed the parties to make a series of changes to the Plan as set out in the Order, and also to “use common sense” to “extend the[] deadlines” in the proposed Plan as part of finalizing the Plan. *Id.* at n.2.

2. The parties have followed the Court’s instructions as to the modifications of the proposed Plan set out in the February 21, 2023 Order, and have also conferred with each other and solicited the Monitor’s input as to the dates in the proposed Plan. The parties have now reached agreement on those dates and on certain other minor emendations to the Plan. The Implementation Plan is accordingly now ready for approval and entry by the Court to “be incorporated into, and become enforceable as part of this Decree.” Defendants note that the plan is being entered over IDOC’s previously articulated objections (namely, that certain terms are not

in compliance with the Prison Litigation Reform Act), but IDOC will execute the plan subject to future court relief it may obtain.

3. Pursuant to the Court's procedures, the Implementation Plan has been submitted herewith to the Court's proposed orders inbox in Word format, and is attached here in PDF format as Exhibit A.

For these reasons, Plaintiffs and Defendants respectfully request the Court to enter the first Implementation Plan in this matter.

Dated: July 31, 2023

By: /s/ Michael D. Arnold
One of Defendants' attorneys

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Respectfully submitted,

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