UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA ANDERSON/GREENWOOD DIVISION

Disability Rights South Carolina and 18 Unnamed Plaintiffs as Class Representatives on behalf of themselves and others similarly situated,

Plaintiffs,

Richland County,

Defendant.

Disability Rights South Carolina and 15) Civil Action No. 8:22-cv-01358-MGL-BM

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs hereby move this Court pursuant to Federal Rule of Civil Procedure 23,

for an Order appointing the undersigned as Class Counsel and certifying the following

Class pursuant to Rule 23(b)(2):

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All individuals who (1) have been detained at ASDGC since April 28, 2022, or will be detained at ASGDC in the future; and (2) suffer from serious mental illness ("SMI").

As set forth in the accompanying Memorandum in Support of Plaintiffs' Motion for Class Certification, certification of the Class is appropriate under Rule 23(a) and (b)(2) of the Federal Rules of Civil Procedure. The Proposed Class is so numerous that joinder of all members is impracticable. There is commonality between Putative Class Representative claims and the claims of the Class. Putative Class Representatives' claims are typical of the class because they arise from the same courses of conduct, they are based on the same legal theories, and their interests would be served by the same equitable relief. Plaintiffs and Plaintiffs' Counsel will adequately represent the interests of the Class. For these reasons, and those in the supporting memorandum accompanying this motion, Plaintiffs respectfully request an Order from the Court certifying the proposed Class; appointing Putative Class Representatives as Class Representatives; and appointment the undersigned attorneys and Burnette Shutt & McDaniel, PA as Class Counsel.

Respectfully submitted by:

s/ Stuart Andrews

Stuart M. Andrews (Fed. I.D. No. 1099) Nekki Shutt (Fed I.D. No. 6530) Ashley Pennington (Fed. Bar No. 3035) Sarah J.M. Cox (Fed. Bar No. 13166) Annie Day Bame (Fed. Bar No. 13363 BURNETTE SHUTT & MCDANIEL, PA Post Office Box 1929 Columbia, South Carolina 29202 Tel: 803.850.0912 | Fax: 803.904.7910 sandrews@burnetteshutt.law nshutt@burnetteshutt.law apennington@burnetteshutt.law abame@burnetteshutt.law

ATTORNEYS FOR PLAINTIFFS

Columbia, South Carolina

September 5, 2024