

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

61
DOCKET
NUMBER

U.S. DISTRICT COURT
WEST. DIST. OF WISCONSIN

MAR 18 1992

FILED

JOSEPH W. SKUPNIEWITZ, CLERK

CASE
NUMBER

CIVIL ACTION NO. 91-C-716-S

DEE FARMER,

Plaintiff,

v.

MICHAEL QUINLAN, ET AL.,

Defendants.

PLAINTIFFS' CROSS CLAIM FOR SUMMARY JUDGMENT

Comes now Dee Farmer, Plaintiff, without the benefit of counsel and moves this Court pursuant to Rule 56, Federal Rules of Civil Procedure for summary judgment in her favor and in support thereof submit:

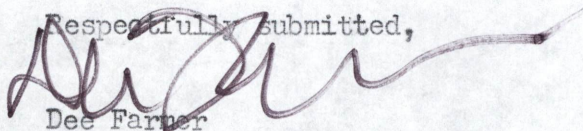
(1) This is a civil action seeking injunctive and monetary relief for alleged Eighth Amendment violations. Plaintiff, a federal prisoner, diagnosed as a transsexual claims that the named defendants, employees of the Federal Bureau of Prisons was 'deliberate indifferent' to her right to safety, by knowingly and willfully designating and confining her in the violent environment of a penitentiary, where she was sexually assaulted. She claims that the defendants actions was unreasonable with 'reckless disregard' for her safety. Based on these claims she requests that this Court grant her summary judgment against the named defendants;

(2) Plaintiff submit her memorandum in support of cross-claim for summary judgment and preliminary opposition to defendants' motion for summary judgment, declarations and other supporting documentation.

WHEREFORE Plaintiff prays* this Honorable Court to:

- (a) Grant her motion for summary judgment;
- (b) Any further and different relief this Court deems ~~just~~
and proper.

Respectfully submitted,



Dee Farmer
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