

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

C.A. No. 80-2136
(June L. Green, J.)

Plaintiffs request the Court to order the Special Officer and defendants to meet and submit to this Court a new officer staffing plan in light of the impact of the continued non-functioning of the dormitory intercom system and the addition of Dormitory 26, as discussed in the Special Officer's report on staffing of August 23, 1989. Plaintiffs further request that the Court order that, if defendants and the Special Officer are not able to submit a mutually agreeable plan within 30 days of this Court's order, the Consent Decree shall be modified to require the defendants to maintain 373 officers available for duty. A memorandum of

points and authorities in support of the motion and a proposed order are attached.

Respectfully submitted,



Peter J. Nickles # 53447
Alan A. Pemberton # 367108
COVINGTON & BURLING
1201 Pennsylvania Ave., N.W.
P.O. Box 7566
Washington, D.C. 20044
(202)662-6000

Counsel for Plaintiffs

Dated: November 7, 1989

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of November, 1989, I caused copies of the foregoing Motion to Modify the Consent Decree's Officer Staffing Requirement, the Memorandum in Support and proposed order to be hand-delivered to:

Richard S. Love, Esq.
Chief, Correctional Litigation
Section
D.C. Department of Corrections
Room NLL-3
1923 Vermont Avenue, N.W.
Washington, D.C. 20001

Paul A. Quander, Jr., Esq.
Deputy Director
D.C. Department of Corrections
1923 Vermont Avenue, N.W.
Washington, D.C. 20001

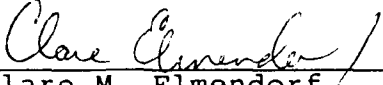
I also certify that on this 7th day of November, 1989, I caused copies of the foregoing to be sent by first-class mail, postage prepaid, to the following:

Edward Koren, Esq.
ACLU National Prison Project
Suite 340
1616 P Street, N.W.
Washington, D.C. 20036

John M. Facciola, Esq.
Assistant United States Attorney
Judiciary Center, Room 4122
555 Fourth Street, N.W.
Washington, D.C. 20001

John R. Mooney, Esq.
Beins, Axelrod & Osborne
Suite 300
2033 K Street, N.W.
Washington, D.C. 20006

Kathryn R. Monaco
Special Officer of the Court
Room 306
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004



Clare M. Elmendorf