UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

WOMEN PRISONERS OF THE DISTRICT OF COLUMBIA DEPARTMENT OF CORRECTIONS, et al.,

Plaintiffs,

Civil Action
No. 93-2052 JLG

FILED

V.

DISTRICT OF COLUMBIA, JUN 2 2 1998

WANCY MAYER WHITINGTON, CLERK U.S. DISTRICT COURT

PLAINTIFFS' MOTION FOR CONTEMPT AND TO ENFORCE THE COURT'S ORDER FOR INJUNCTIVE RELIEF

Plaintiffs, the women prisoners of the District of Columbia, bring this motion to enforce the Court's Order for Declaratory and Injunctive Relief (Rev. Order 6/16/97).

Defendants have been under order to remedy constitutional violations since December 1994, but to date, many remedies have still not been implemented in the areas of sexual misconduct, environmental and fire safety at the Correctional Treatment Facility (CTF), and programs at CTF. Thus, plaintiffs seek relief from this Court to enforce the relief previously imposed.

For the reasons set forth in the accompanying memorandum in support of this motion, plaintiffs request that the Court enter the attached order finding the defendants in violation of the Order for Declaratory and Injunctive Relief. In addition, plaintiffs seek relief in the form of prospective fines, a court-appointed expert, and attorneys' fees for the

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defendants' failure to abide by the Court's Order.

Respectfully submitted,

COVINGTON & BURLING

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Attorneys for Plaintiffs

Dated: June 22, 1998

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 22, 1998, I caused a copy of the foregoing Plaintiffs' Motion for Contempt to be hand-delivered to:

Maria Amato, Esq. Assistant Corporation Counsel 441 4th Street, N.W. 6th Floor South Washington, D.C. 20001

Lisa J. Stevenson

Attorney for plaintiffs

Women Prisoners/DC v. DC