

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION

ALABAMA DISABILITIES ADVOCACY)
PROGRAM,)
)
Plaintiff,)
)
v.)
)
J. WALTER WOOD, JR. in his official)
Capacity as Executive Director of the)
Alabama Department of Youth Services,)
)
Defendant.)

Civil Action No. 2:07cv434-MHT

**JOINT MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT AND
RETENTION OF JURISDICTION**

On August 27, 2008, this Court ordered the parties to file a joint motion for approval of settlement, with the proposed settlement attached, by September 5, 2008 (Doc. No. 78). The parties have conferred and submit this joint motion for approval of settlement as ordered.

WHEREFORE, the parties jointly move this Court for approval of the Settlement Agreement in this case, attached as Exhibit 1 to this motion, and for this Court to retain jurisdiction of this case for a period of one year.

The parties note that the Settlement Agreement incorporates a detailed:

- 1) Protocol for facilitating ADAP’s access to DYS facilities, employees, records, and to students who are in the custody of DYS, including in the physical custody of DYS whether at DYS or at DYS-contract facilities and their records, and
- 2) Process for dispute resolution between the parties in the event that a dispute should arise regarding ADAP’s access to DYS facilities, employees, records, and students.

Respectfully Submitted,

/s/ James A. Tucker
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ATTORNEYS FOR PLAINTIFF

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this the 5th day of September, 2008, I filed the foregoing with the Clerk of the Court using the CM/ECF system that will send notice of such filing to the following (or by U.S. Mail to non-CM/ECF participants):

T. Dudley Perry, Esq.
Sancha E. Teele, Esq.
Counsel for Defendant

/s/ James A. Tucker
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