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William W. Deaton R. Raymond Twohig, Jr. (505) 843-6223

June 26, 1985

John Bigelow, Esq. P.O. Drawer 9570 Santa Fe, NM 87504

RE: PROPOSED MODIFICATION OF MAXIMUM SECURITY POLICY STATEMENT

Dear Mr. Bigelow:

In your letter of May 20, 1985, you proposed to modify the provisions of Paragraph 3(a)(i) and Paragraph 9 of the Maximum Security Policy Statement. We have informally indicated to you that we do not agree with these proposed changes, and this letter will serve as formal notice of our disagreement. In our opinion, altering the Decree in such a way that someone can be locked up in maximum security for up to two years for possession of a weapon is such a departure from the disciplinary and maximum security scheme that it would work so as to lessen the benefits to the Plaintiffs class.

William W. Deaton

Yours very truly,

WWD/cjg

cc: Mark Donatelli, Esq. Steve Ney, Esq. Vince Nathan, Esq.

EXHIBIT 'B" TO DEFENDANTS' MOTION TO MODIFY THE MAXIMUM SECURITY POLICY STATEMENT OF THE CONSENT DECREE - Page 1 of 1