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Danny S. Wilde  
Michael H. Reese  
Michael R. O'Donnell  
Attorneys for Plaintiffs  
Protection & Advocacy System, Inc.  
2424 Pioneer Avenue, Suite 101  
Cheyenne, Wyoming 82001

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

71

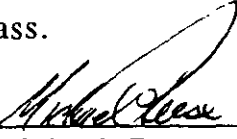
ANNA MARIA WESTON, by her )  
guardian Barbra Weston, et al., )  
 )  
Plaintiffs, )

v. )

CIVIL ACTION NO. C90-0004

WYOMING STATE TRAINING SCHOOL, )  
et al., )  
 )  
Defendants. )

Comes Now, undersigned counsel by and for the class as certified by the Court on April 30, 1990, files the attached "Affidavits of Publication" as published in the Wyoming Eagle, Casper Star-Tribune and Riverton Ranger to comply with Rule 23(a) of the Federal Rules of Civil Procedure for notification of proposed settlement to the class.

By:   
Michael Reese  
2020 Carey Avenue, Suite 704  
Cheyenne, Wyoming 82001  
(307) 638-6785

**Proof of Publication**

THE STATE OF WYOMING }  
County of Laramie } ss.

**AFFIDAVIT**

R.M. Brown of said County of Laramie, being first duly sworn, deposes and says that he is Vice President; or L.D. Catalano, of said County of Laramie, being first duly sworn, deposes and says that he is the Office Manager of the

The Wyoming Eagle

a newspaper printed and published in said County and State, and in the Capitol of said State; that the notice of which the annexed is a true copy, has been published in the said newspaper

for One times, to-wit:

April 12, 1991

and that the first publication of said notice was made in said paper bearing date

April 12 A.D. 1991

and the last publication of said notice was made in said paper bearing date

April 12, A.D. 1991

Subscribed in my presence and sworn to before me by the aforesaid R.M. Brown, Vice President, or L.D. Catalano, Office Manager,

this 15

Day of April, 1991  
My commission expires:

Feb 4, 1992

Frances J Hardy  
Notary Public

**Legal Notice**

**Legal Notice**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

ANNA MARIA WESTON, by her  
guardian Barbra Weston,  
et al.,

Plaintiffs,

v.

WYOMING STATE TRAINING  
SCHOOL, et al.,

Defendants.

CIVIL ACTION NO. C90-0004

**NOTICE TO CLASS MEMBERS**

On January 3, 1990, the above-captioned lawsuit was filed in the Federal Court for the District Court of Wyoming regarding conditions at the Wyoming State Training School (WSTS). This suit was filed as a class action on behalf of the individuals registered on the roles of WSTS on the date the Complaint was filed and for individuals at risk being placed at WSTS.

The class was subsequently certified by the Court on April 30, 1990 as "all individuals with mental retardation currently at WSTS, or who are currently or may in the future be at risk of placement at WSTS, including youths from birth to 21 years, adults and senior citizens".

A proposed settlement of this lawsuit has been reached with the State of Wyoming in a 66 page Stipulation Agreement. You may review a copy of the proposed Stipulation Agreement at the following places:

- A. The administrative offices of the Wyoming State Training School in Lander, Wyoming;
- B. The Clerk of the U.S. District Court at the Court in Cheyenne and Casper, Wyoming.

A summary of the Stipulation Agreement is contained below.

As a member of the class, you have a right under the Federal Rules of Civil Procedure, Rule 23(a), to receive notice of the settlement. The settlement is subject to the approval of the Court. Moreover, if you feel that the terms and conditions of the settlement are unfair or unjust, you may file a written objection. Any objection you make must be received by May 10, 1991. Send your objection to the Clerk of U.S. District Court, P.O. Box 727, Cheyenne, Wyoming 82002.

It would be helpful if you would give the page and paragraph number of each provisions of the Stipulation Agreement that you wish to object, and the reasons for your objection. If you have any questions about your individual rights under the Stipulation Agreement, or its terms and conditions, you can write to the attorneys representing the class or the State of Wyoming:

**Attorneys for the Class:**

Michael Reese  
Wiederspahn, Lummis &  
Llepas, P. C.  
2020 Carey Avenue, #704  
Cheyenne, Wyoming 82001

Danny Wilde  
General Counsel  
Protection & Advocacy  
System, Inc.  
2424 Pioneer Avenue, #101  
Cheyenne, Wyoming 82001

**Attorney for the State of Wyoming:**

Dennis M. Coll  
Senior Assistant Attorney General  
State Capitol Building  
Cheyenne, Wyoming 82002

The following contains a summary of the Stipulation Agreement. How-  
ever, it is not a substitute for the actual Stipulation Agreement and

# AFFIDAVIT OF PUBLICATION

STATE OF WYOMING }  
CITY OF FREMONT } ss.

*Steven R. Nick*, do solemnly

10 The Riverton Ranger, Riverton, Wyoming

Thursday, A that I am the Publisher or the Associate

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

ANNA MARIA WESTON, by her  
guardian Barbra Weston, et al., Plaintiffs,

v.

WYOMING STATE TRAINING SCHOOL  
ET AL., DEFENDANTS

**CIVIL ACTION NO. C90-0004  
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Attorneys for the Class:  
Michael Reese  
Widerspahn, Lummis &  
Lirpas, P.C.  
2020 Carey Avenue, # 704  
Cheyenne, Wyoming 82001

Danny Wilde  
General Counsel  
Protection & Advocacy  
System, Inc.  
2424 Pioneer Avenue #101  
Cheyenne, Wyoming 82001

Attorney for the State of Wyoming:

her of THE RIVERTON RANGER, THE  
TON REVIEW, AND THE RIVERTON TIMES,  
y paper of general circulation, published  
times a week at Riverton, Fremont

Wyoming, that the notice attached  
and which is a part of this affidavit,

published in said newspaper for 1

~~five weeks (issues)~~ the first publication

been on the 11th of April

1991, and the last publication on

th day of April, A.D.,

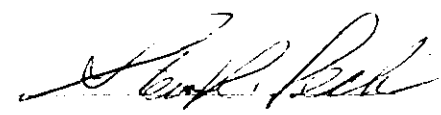
—, that said notice was published in

ular and the entire issue of every num-

the paper during the period and times

ication, and that the notice was pub-

n the newspaper and not in a supple-



ANNA MARIA WESTON  
by her guardian  
Barbra Weston et al  
Plaintiffs

v  
WYOMING STATE  
TRAINING SCHOOL  
et al  
Defendants  
CIVIL ACTION  
NO C90-0004

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Attorneys for the Class:  
Michael Reese  
Wiederspahn, Lummis & Leipas, P.C.

RECEIVED APR 13 1991

2020 Carey Avenue #704  
Cheyenne, Wyoming 82001  
Danny Wilde  
General Counsel  
Protection & Advocacy  
System Inc  
2424 Pioneer Avenue #101  
Cheyenne, Wyoming 82001  
Attorney for the State of  
Wyoming  
Dennis M. Coll  
Senior Assistant Attorney  
General  
State Capitol Building  
Cheyenne, Wyoming 82002

The list below contains a summary of the Stipulation Agreement. However, this summary does not purport to be comprehensive or definitive, and reference should be made to the full Agreement for the complete details of all terms and conditions.

1. The Stipulation Agreement sets a bed limit at WSTS of 161 by December 31, 1994, with the understanding that an additional 29 beds are reserved on-ly the the Health Care Center. During the duration of this Agreement, the number of class members at WSTS will be gradually reduced to meet the above-cited number.

2. Standards relating to staffing and the physical environment are established, such that staffing ratios will be improved at WSTS and that there will be physical improvements to their facilities at WSTS.

3. All class members will have an Individual Program Plan (IPP) to be enforced by the State of Wyoming and implemented within certain time deadlines.

4. Class members who leave WSTS will be placed in community programs and shall receive services as identified in the IPP.

5. All class members in the community will have an independent case manager who advocates on and for their behalf. The case manager will be located throughout the State of Wyoming and employed by the State of Wyoming.

6. A dispute resolution process has been established to enable class members an opportunity to seek redress of problems and differences.

Please reads this Notice carefully. If you have any questions, you can write to the attorneys listed above, if you want to comment on any portion of the Agreement, write to the Clerk of the Court. Any comments will be considered by the Court.

Michael Reese  
Attorney at Law  
Wiederspahn, Lummis & Leipas, P.C.

2020 Carey Avenue, #704  
Cheyenne, WY 82001  
Danny S. Wilde  
General Counsel  
Protection & Advocacy  
System, Inc.

2424 Pioneer Avenue, #101  
Cheyenne, WY 82001  
Legal No. 20290 Publish:  
April 13, 1991

COUNTY OF NATRONA  
STATE OF WYOMING

I, the undersigned, being a person in the employ of the CASPER STAR-TRIBUNE, a newspaper published at CASPER, NATRONA COUNTY, WYOMING, and knowing the facts herein set forth do so solemnly swear that a copy of the notice as per clipping attached was printed

and published daily ~~weekly~~ in the regular and entire issue of said newspaper, and not in any supplement thereof, for

one consecutive days ~~weeks~~

commencing with issue dated

April 13, 1991 and  
ENDING with issue dated

April 13, 1991.

Signed: Joni Beckner

Subscribed in my presence  
and sworn to before me this

15<sup>th</sup> day of April  
1991.

[Signature]

