Brown v. Plata

I. STATEMENT OF FACTS

A. Defendants' Policies and Practices Expose Class Members to an

Id.

2. Defendants' Policies Regarding Access to Primary Care Expose Class Members to an Unreasonable Risk of Serious Harm

Id.

Id.

Id.

Id.

[1] *See, e.g.*

3. Defendants' Policies Regarding Access to Specialty Care and Outside Facilities Expose Class Members to an Unreasonable Risk of Serious Harm

Id.

Id.

see also

B. These Deficient Policies and Practices Have Exacerbated Medical ’ dical ’ s.Uytingpre

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-
-
-

Id.

more

fewer

Id.

avoid

See, e.g.

D. Defendants Discriminate Against Inmates with Disabilities

Id.

Diamond *see also, e.g. In re Rodriguez*

See, e.g. Dunn

Williams

Dockery

See, e.g. Lightbourn v. Cnty. of El Paso

see also *supra*

Comput. Corp.

all

B. Plaintiffs' Claims Satisfy Rule 23(b)(2)

M.D.

see also, e.g. Dockery

Hernandez

C. Plaintiffs' Counsel Should Be Appointed as Class Counsel Under Rule 23(g)

See

See

Ball v. LeBlanc

IV. CONCLUSION

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pro hac vice
pro hac vice)

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CERTIFICATE OF SERVICE

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