



MR-CT-005-005

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

UNITED STATES OF AMERICA, : CIVIL NO. N-86-252 (EBB)  
Plaintiff, :

v. :

STATE OF CONNECTICUT, William :  
A. O'Neill, Governor of the :  
State of Connecticut; Brian :  
Lensink, Commissioner, :  
Connecticut Department of :  
Mental Retardation; Robert :  
Griffith, Director, Southbury :  
Training School. :

Defendants. : JULY 28, 1987

MOTION FOR MODIFICATION  
OF CONSENT DECREE

The Consent Decree in this action was filed in July, 1986. The Decree was entered as a judgment of this Court on December 22, 1986. The defendant prepared three drafts of the Implementation Plan required by the Consent Decree. The latest implementation plan was filed on June 6, 1987.

Due to delays in obtaining court approval of the Consent Decree, further delays in developing an implementation plan satisfactory to all parties, and original Consent Decree dates which do not coincide with the State fiscal year, the

FILED

7/31/87 J. J. [unclear] B. [unclear]

defendants thereby move that the following modifications be made to the Consent Decree:

- 1) (p. 9) That the compliance dates for lines F and G, Direct Care Workers, be changed from February 1, 1987 and February 1, 1988 to AUGUST 1, 1987 and AUGUST 1, 1988, respectively;
- 2) (p. 15) Sec. VII 1. That the date in paragraph 1 be changed from February 15, 1988 to DECEMBER 1, 1988.

The plaintiff has been advised of this Motion and does not object to the modifications proposed herein. Therefore, the defendants respectfully move that these modifications be accepted by the Court and that the Consent Decree so modified be entered as the Judgment of this court replacing the previous judgment of December 22, 1986.

DEFENDANTS

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CERTIFICATION

I hereby certify that a copy of the foregoing was mailed in accordance with Rule 5(b), F.R.C.P., this 28th day of July, 1987, to the following counsel of record:

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