

PLAINTIFFS

DEFENDANTS

STEWART  
HAIGHT, J.

RIGHTS, EQUALITY ALWAYS AT LETCHWORTH INC.:  
ET AL  
See Page #1A for list of plttfs'

CUOMO, MARIO M. as Governor of N.Y.  
ET AL  
See Page #1A for list of deft's. } Sour  
1-3

*Rec'd dis  
11/6/85*

CAUSE

20 USC 1401 et seq; (CITE THE U.S. CIVIL STATUTE UNDER WHICH THE CASE  
29 USC 794 IS FILED AND WRITE A BRIEF STATEMENT OF CAUSE)  
42 USC 6001, 1396, 1983: Declaratory & injunctive relief & plttfs' civil rights.

ATTORNEYS

MURRAY B. SCHNEPS, ESQ. &  
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by letter dated 10-7-85  
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MR-NY-0004-9000

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	RECEIPT NUMBER		CARD DATE M
	C.D. NUMBER		JS-5
JUN 13 1984 95 265			JS-6 11-19-91

- 06-13-84 1 Filed Complaint-Issued Summons & Notice purs, to 28 USC 636(c).
- 07-05-84 2 Fld. notice of Reassignment to Judge Stewart, mailed copy to attys
- 08-09-84 3 Filed defts Hecker and Davis Compliane with plttfs First Request for Production of Documents.
- 08-16-84 4 Filed ANSWER of The State defts
- 08-21-84 5 Filed ANSWER of deftsm Margaret M. Heckler, Secretary of the United States Dept. of Health and Human Services and Carolyne K, Davis RWG
- 11-05-84 6 Filed defts notice of motion for an order purgant to rule 4(c) and 4(d) dismissir the complaint as a class action. ret. 11-16-84.
- 11-05-84 7 Filed defts Memorandum of law in support of above motion to dismiss as a class action. orig. to chambers
- 11-14-84 8 Filed plttfs affdvt. and notice of motion for class certification pursuant to rule 23 (a) and 23(b) and (2) ret. 11-30-84.
- 11-14-84 9 Filed Declaration of Murray B. Schneps for the plttfs in Opposition to the defts motion for an order dismissing this action as a class action.
- 11-14-84 10 Filed plttfs Memorandum in support of above motion for class certification
- 11-14-84 11 Filed plttfs Memorandum of law in Opposition to defts Motion to dismis action as a class action. orig. to chambers
- 12-07-84 (12) Filed State Defts Affidavit in connection with plttfs' motion for class certificati: by: ARNOLD D. FLEISCHER orig to chambers
- 12-07-84 (13) Filed State Defts' MEMORANDUM OF LAW
- 01-02-84 (14) Filed Plttfs' Reply Declaration in support of class certification by: MICHAEL S. LOTTMAN, orig to chambers
- 03-14-85 --- PRE-TRIAL CONFERENCE HELD BEFORE Mag: Washington
- 03-18-85 15 Filed ORDER, that counsel for the State defts inform plttf, and Chambers as to any objection he has regarding plttf's response to the State defts document production request, on or before March 29, 1985, the next conference in this matter will be held in the Chambers of Mag: Washington. (csc) 3-18-85
- 04-19-85 16 Filed ORDER, that deft's motion to dismiss this action as a class action is denied plttfs motion for class certification is held in abeyance for 60 days in response to defts request for limited discovery on the issues etc. as --Mag: Washington (csc) 4019-85.

05-01-85 --- PRE-TRIAL CONFERENCE HELD BEFORE Mag: Washington

PC 117A  
(Rev. 1/75)

CIVIL DOCKET CONTINUATION SHEET

FPI-MAR-7-14-80-70M-4398

PLAINTIFF RIGHTS, EQUALITY ALWAYS AT LETCHWORTH, INC., ET AL		DEFENDANT CUOMO, MARIO M. ET AL	DOCKET NO. _____ PAGE ____ OF ____ PAGES
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DATE	NR.	PROCEEDINGS	HAIGHT, J.
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RIGHTS, EQUALITY ALWAYS AT LETCHWORTH, INC.; CHARLES PRIAL CONNOR, by his mother Elizabeth Connor; BENITO DeVIVO, by his mother Norma DeVivo; MARY FRIEDLAND, by her mother Jean L. Friedland; MARTHA EILEESH KOENIG by her mother, Noreen Koenig; KENNETH S. ROSENBERG, by his mother Esther Rosenberg; ROBERTA JEAN SAMPER, by her mother Mary T. Samper; J. LAWRENCE SHOTTS, by his mother Katheryne R. Shotts; HELEN SOCRATES, by her father George Socrates; CYRENA ELLEN SOSIS, by her father Zachary Sosis; and ELIZABETH SULLIVAN, by her mother Eileen Sullivan, on behalf of themselves and all others similarly situated,

Plaintiffs,

-against-

MARIO M. CUOMO, as Governor of the State of New York; ARTHUR Y. WEBB, as Commissioner of the New York State Office of Mental Retardation and Developmental Disabilities; ANTHONY PENGE, as Acting Associate Commissioner of the New York State Office of Mental Retardation and Developmental Disabilities; ALBERT P. ROBIDOUX, as Director of the Letchworth Village Developmental Center and of the Letchworth Developmental Disabilities Services Office; CESAR A. PERALES, as Commissioner of Social Services of the State of New York; DAVID AXELROD, M.D., as Commissioner of Health of the State of New York; RAYMOND SWEENEY, as Director of the Office of Health Systems Management in the New York State Department of Health; MARGARET M. HECKLER, as United States Secretary of Health and Human Services; and CAROLYNE K. DAVIS, as Administrator of the Health Care Financing Administration in the United States Department of Health and Human Services,

Defendants.

## CIVIL DOCKET CONTINUATION SHEET

FPI-MAR-7-14-80-70M-4398

PLAINTIFF RIGHTS, EQUALITY ALWAYS	DEFENDANT MARIO M. CUOMO ET AL	DOCKET NO. 84-4163 (CES) PAGE 3 OF _____ PAGES
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DATE	NR.	PROCEEDINGS
05-06-85	17	Filed ORDER, that State defts Interrog. # 10 is to be answered as rephrased referring to all residents of Letchworth from the date this action was filed to the present etc. all class certification <del>discovery</del> is to be completed on or before June 18, 1985--Mag: Washington copies mailed 5-6-85
06-04-85	18	Filed State defts affdvt. of Frances F. Lapins in compliance with the order of magistrate Washington, dated May 2, 1985. orig. to chambers
06-26-85	19	Filed ORDER, that defts counsel is to submit to the Court all further papers in response to plttfs motion for class certification on or before July 5, 1985--Mag: Washington (csc dare unknown)
07-05-85	20	Filed State defts affdvt. of Albert P. Robidoux, in Opposition to plttfs motion for class certification.
07-05-85	21	Filed State defts Supplemental Memorandum in Opposition to plttfs Motion for Class certification. orig. to chambers
07-05-85	22	Filed State defts affdvt. by Jack Bernstein of perso-al knowledge
07-05-85	23	Filed affdvt. of Jeffrey I. Slonim for the State defts in Opposition to plttfs motion for class certification. orig. to chambers
08-30-85	24	Filed State defts notice of taking deposition of Alan J. Saperstein on 9-11-85 --subp. iss.
08-30-85	25	Filed state defts notice of taking deposition of Annmarie Schmidt on 9-11-85--supb. iss.
08-03-85	26	Filed State defts notice of taking deposition of deft. Carolyne K. Davis on 9-11-85
09-03-85	27	Filed REPORT AND RECOMMENDATION IN RE; TO PLTTFS motion for class certification plttfs motion is gratned as proposed exception that corporate plttf Real be dismissed without prejudice as a plttf for lack of standing. and the parties have ten (10) days within to lodge written objections. Mag; Washington (csc)
11-06-85	28	Filed ORDER, affirming the Magistrate's report and recommendation and grant the motion for class certification, We also order that the plttf. Real be dismissed without prejudice. Real may submti an order for its appointment as guardianad litem pursuant to rule 17(c)==Stewart, J. (csc) date unknown
11-14-85	29	Filed ORDER that pursuant to rule 17(c) Rights, Equality , Always at Letchworth Inc is appointed guardian ad litem to assist the named individual plttfs in representing the interests of absent class members.--Stewart, J. c/m continued on page--4--

CIVIL DOCKET CONTINUATION SHEET

PLAINTIFF	DEFENDANT	DOCKET NO. <u>84-4163</u>
EQUALITY RIGHTS ALWAYS AT LETCHWORTH	INC, CUONO, MAIRO M. AS GOVERNOR DT AL	PAGE <u>4</u> OF <u>    </u> PAGE

DATE	NR.	PROCEEDINGS
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04-21-86 30 Filed pltffs notice of taking deposition of Annemarie Schmidt and Alan J. Sapeh on 4-15-86.

06-20-86 31 Filed ORDER, that plttf is to circulate an initial pre-trial order on or before August 25, 1986 and plttf. to submit a final pre-trial order 9-26-86  
Mag: Washington (csc) 6-9-86

*06-09-86 - -* **PRE-TRIAL CONFERENCE HELD BY** *Mag: Washington*

08-10-86 32 Filed plttf-s certificate of compliance, memo. and notice of motion for an order to compel discovery. ret. 8-28-86.

08-22-86 33 Filed plttffs notice of taking deposition of K, Michele Dulemba Area Office Director (Long Term Care), New Rochelle Area Office Dr. Robert Jaslow on 8-29-86

09-09-86 34 Filed deft. Commissioner Webb and the other State defts. memorandum of law in Opposition to plttffs Motion to Compel Productions. orig. to chambers

*09-11-86 - -* **PRE-TRIAL CONFERENCE HELD BY** *Mag: Washington*

09-18-86 35 Filed ORDER, that plttffs revise their position to include facts that are only undisputed, defts to prepare their portion of the pre-trial order by 9-18-86 etc.--Mag: Washington (csc 9-17-86)

09-25-86 36 Filed defts Boowen and Roper notice of motion for an order pursuant to rule 3(2) and in accordance with rule 6(a) and (e) defer an order dismiss the complaint as against said defts pursuant to rule 12(b) (1) ret. on submission

09-25-86 38 Filed defts Bowen & Roper memo, in support of deferral defts motion to dismiss. orig. to chambers

10-03-86 39 Filed Supplemental Order, that the Atty. Gen. produce all of Commissioner Webb's reports as requested by plttf. Mag: Washington (csc 10-3-86)

10-08-86 40 Filed plttf's memorandum in Opposition to Federal defts Motion to Dismiss. orig. to chambers

10-10-86 41 Filed defts Reply memo. of law in support of Federal defts Motion to dismiss. orig. to chambers

10-14-86 -- Filed Memo. end. on document #36 defts Bowen & Roper motion to dismiss. The defts motion to dismiss on the ground that plttffs lack standing is denied, etc. as indicated--Stewart J, c/m 10-16-86 orig. to chambers

*05-14-87* **PRE-TRIAL CONFERENCE HELD BY** *Judge Stewart* *Cont on page-5-*

CIVIL DOCKET CONTINUATION SHEET

PLAINTIFF Rights, Equality Always At Letchworth Inc., et al	DEFENDANT Mario M. Cuomo, as Government of the State of New York, et al.,	DOCKET NO. <u>84-4163</u> (CES) PAGE <u>5</u> OF <u>    </u> PAGES
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DATE	NR.	PROCEEDINGS
05-27-87	42	Filed plttf's declaration and notice of motion for an order holding the State defts in contempt, ret. 6-12-87. dd
06-10-87	43	Filed the State defts affdv.t by: Jeffrey I Slonim in Opposition to to Mr. Schnep's motion to hold all of the State defts in contempt orig to chambers dd
06-12-87	--	Filed Memo end on document #42 plttf's motion for an order holding the State defts in contempt For plttfs having withdrawn this motion by letter date June 10, 1987, plttfs motion to hold defts in contempt is moot --Stewart, J. 6-15-87 dd
12-2-87	44	Fld. ORDER of Reference to Magistrate for General pretrial...STEWART, J.
12-2-87	----	Fid. MEMO ENDORSED on doc # 44...Mag Grubin was assigned on 11-30-87...KR cm
1-20-88	-	<i>P.T.C Held by mag Grubin</i>
2-10-88	-	<i>P.T.C Held by mag Grubin</i>
3-7-88	-	<i>P.T.C Held by Mag Grubin</i>
3-3-88	45	Fld. SCHEDULING ORDER that parties make all discovery request upon one another on 3-22-88 All discovery be completed by 8-31-88...MAG GRUBIN cmc kr
3-25-88	46	Fld. Notice to take deposition of Arthur Y. Webb on 4-21-88
3-25-88	47	Fld. Notice to take deposition of Albert P. Robidoux on 4-22-88 kr
3-25-88	48	Fld. Notice to take deposition of Anne Marie Schmidt Nancy Barell, Jane friedman on 5-6-88 kr
3-25-88	49	Fld. Notice to take deposition of K. Michele Dulemba LVDC Survey Team Leader on 4-26-88 kr
5/10/88	-	<i>P.T.C Held by mag Grubin</i>
8-29-88	-	<i>P.T.C Held by mag Grubin</i>
1-6-89	50	Fld. ORDER for notice and hearing on settlement. Ordered that a hearing shall be held on 1-25-89..STEART, J. cm kr
1-20-89	51	Fld. Pro Se Objections to proposed settlement kr
1-25-89	52	Fld. State Defts AFFIDAVIT of Jeffrey I. slonim in support of proposed settlement kr
1-25-89	53	Fld. Atthy Declaration of Michael S.Lttman, with respect tothe compliance with courts order for notice and Hearing on settlementn dated 1-6-89.
1-25-89	54	Fld. DECARATION of Michael S.Lottman, in supporto f Plttfs and State defts joint application for approval of the stip of settlement dated 11-14-88

CIVIL DOCKET CONTINUATION SHEET

PLAINTIFF RIGHTS, EQUALITY ALWAYS ETC.	DEFENDANT CUOMO, MARIO M. etc. et al.	DOCKET NO. 84-4163
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DATE	NR.	PROCEEDINGS	STEWART, J.
1-25-89	55	Fld. STIP OF DISMISSAL against Federal Defts....	STEWART, J. kr
1-25-89	56	Fld. STIP OF SETTLEMENT between the Plffs and the State Defts. ... CMC	STEWART, J. kr
1-27-89	57	Fld. DECLARATOIN of Michael S. Lottman, in support of pltffs and State defts joint paplication for approval of the stip of settlement dated 11-14-88	
1-27-89	58	Fld. Attys Declaration of Michael .S. Lottman, with respec totthe compliance with this courts order for notice and hearing on settlment dated 1-6-89	k
5-4-89	59	Filed transcript of record of proceedings, dated January 25, 1989	I
1-3-90	60	Fld. STIPULATION AND ORDER OF SETTLEMENT OF FEES AND COSTS....by and between pltffs and the State defts, that any and all claims pltffs have, or may have, to recover attys' fees or costs as a result of this action or the settlement thereof are hereby settled and resolved, without trial and without any determination or concession of liability, as follows: Deft Commission of the N.Y. State Office of Mental Retardation and Developmental Disabilities shall pay to pltffs \$290,000 in full settlement of any and all claims for fees or costs as against any of the State defts, up to and including 4-11-89.....SO ORDERED STEWART, J.	MJ
2-27-91	61	Fld. Pltffs' NOTICE OF MOTION FOR ENFORCEMENT OF STIPULATION OF SETTLEMENT, for a order against defts providing the following relief: Declaring the defts to be in violation of, inter alia, paragraphs 2(a)-(b)...Requiring defts, with the aid of a qualified outside person or entity acceptable to pltffs, to design and implemen a written facility strategy for providing active treatment to LVDC..Appointing a full time monitor or master...Awarding pltffs the costs and disbursements of thi action.... Attached is the Attorney's Declaration of Michael S. Lottman in sup- port of pltffs' motion for enforcement of the Stipulation of Settlement. RET: 3- 8-91. (orig. to Chambers)	MJ
2-27-91	62	Fld. Pltffs' MEMORANDUM in support of motion for enforcement of Stipulation of Settlement. (orig. to Chambers)	MJ
3-8-91	63	Fld. State Defts' MEMORANDUM OF LAW in opposition to pltffs' motion for "enforce- ment" of the stipulation of settlement. (orig. to Chambers)	MJ
3-8-91	64	Fld. State Defts' Affidavit of Jeffrey I. Slonim in opposition to pltffs' motion for "enforcement" of the stipulation of settlement. (orig. to Chambers)	M
3-19-91	65	Fld. State Defts' Affidavit of Frederick J. Zazycki in opposition to pltffs' Motion for "Enforcement" of the Stipulation of Settlement. (orig. to Chambers)	M
3-27-91	66	Fld. State Defts' EXHIBITS in opposition to Pltffs' Motion for "Enforcement" of the Stipulation of Settlement. (Dktd per instructions of Chambers)	M

CIVIL DOCKET CONTINUATION SHEET

PLAINTIFF		DEFENDANT	DOCKET NO. <u>84-4163</u>
RIGHTS, EQUALITY ALWAYS ETC.		CUOMO, MARIO M. etc. et al.	PAGE <u>7</u> OF <u>    </u> PAGES
DATE	NR.	PROCEEDINGS	STEWART, J.
4-2-91	67	Fld. Pltffs' REPLY MEMORANDUM. (orig. to Chambers)	MJ
4-2-91	68	Fld. Pltffs' DECLARATION OF Patricia Staszko-Kozik in support of Pltffs' motion for enforcement of the Stipulation of Settlement. (orig. to Chambers)	MJ
4-2-91	69	Fld. Pltffs' ATTORNEY'S SUPPLEMENTAL DECLARATION OF Michael S. Lottman in support of pltffs' pending motion for enforcement of the Stipulation of Settlement. (orig. to Chambers)	MJ
4-18-91	70	Fld. RE-REFERRAL ORDER OF REFERENCE TO A MAGISTRATE JUDGE GRUBIN, ...General Pre-trial (including all discovery motions) Substantive Motions (i.e. Rule 12(f) motions, amend complaint, summary judgment, attys fees, and injunctive relief); Settlements; Trials under (See Separate Memo Attached) 28 U.S.C. 636(c).....SO ORDERED STEWART, J. cm MAGISTRATE JUDGE GRUBIN WAS ASSIGNED THE ABOVE MATTER ON 4-18-91. (Copy in Magistrate Grubin's (Chambers 4-23-91)	MJ
8-14-91	-	PRE-TRIAL CONFERENCE HELD BY <i>J. Grubin. ar</i>	
* 11-19-91	71	Fld. AGREEMENT AND ORDER,.....that all of the claims set forth in pltffs' Motion for Enforcement, as against any and all defts, are hereby settled and resolved, without trial and without any determination or concession of the merits of the motion.....This Agreement shall be effective until the later of (a) 3-13-93 or (b) such time as LVDC has been determined by the State Medicaid survey agency..... Pltffs reserve the right to seek an award of attys' fees and costs and disbursements in connection with the making of the Motion for Enforcement and this Agreement resolving all aspects of that motion.....SO ORDERED STEWART, J. cm	MJ
12-5-91	72	Fld. Pltffs' DECLARATION OF MICHAEL S. LOTTMAN in support of proposed agreement. (Orig. to Chambers)	MJ
3/16/92	73	Fld. Stip. & Order...that it shall not be a violation of either the Stipulation Settlement, entered as an order on 1/25/89, or the Agreement & Order, entered as an Order on 11/19/91, for defendants to relocate the Multiply Disabled Unit to the campus of LVDC, or to increase by 75 beds the capacity of the MDU etc; and the OMRDD defendants shall, by the end of the 1992-93 fiscal year, place 60 LVDC residents into appropriate community residences etc. So Ordered. STEWART, J. SC	
3/23/92	74	Fld. Plaintiffs' Declaration of Michael S. Lottman in support of Proposed Stipulation & Order. SC	
8/25/92	75	Fld. Stip. & Order of Settlement of Fees & Costs...that Defendant Commissioner of the New York State Office of Mental Retardation and Developmental Disabilities will pay to pltffs \$47,500 in full settlement of any and all claims for attorneys' fees etc. as against any and all of the State defendants or against the State, for the period 4/12/89 to and including 12/9/91 etc. So Ordered. STEWART, J. SC	



CIVIL DOCKET CONTINUATION SHEET

PLAINTIFF		DEFENDANT	DOCKET NO. _____
			PAGE ____ OF ____ PAGES
DATE	NR.	PROCEEDINGS	
3/3/93	76	<p>Fld. Stip. &amp; Order...that the OMRDD defts will provide to plttffs by 4/1/93, a comprehensive implementation plan for the closure of LVDC (the "closure plan"); that the closure plan will provide for the closure of LVDC by 3/31/96, and will specify the number of community placements to be made out of LVDC each fiscal year between the present and fiscal 1995-96; and that the OMRDD defendants will promptly provide all reasonable compensation, costs etc. for the Independent Expert Consultant purs. to the Stipulation of Settlement etc. So Ordered. STEWART, J. SC</p>	
3/15/93	77	<p>Fld. Plaintiffs' Attorney's Declaration of Michael S. Lottman in support of the Stip. &amp; Order submitted for the Court's approval on 3/1/93. SC</p>	
7/13/93	78	<p>Fld. Stip. &amp; Order...that it shall not be a violation of any term of any stipulation or agreement and order previously entered in this case for the Multiply Disabled Unit at Letchworth Village Developmental Center to be operated at a capacity of 200 beds; and that no later than 90 days after approval of this stipulation, all plttff class members residing in the Multiply Disabled Unit in building 19 at the Rockland Psychiatric Center shall be transferred to the Multiply Disabled Unit on the Letchworth Village Developmental Center campus etc. So Ordered. STEWART, J. SC</p>	
7/21/93	79	<p>Fld. Plttff's Declaration of Michael S. Lottman in support of Proposed Stip. &amp; Order. SC</p>	
3/29/96	80	<p>Fld... NOTICE OF MOTION..Extending the effective dates of the stipulation of settlement herein dated January 15, 1989 the agreement and order herein dated November 19, 1991, and the stipulation and order herein dated March 3, 1993; granting additional or alternative relief as set forth in the attached memorandum; and awarding such other, further, and different relief as the court may deem appropriate. This motion is based in part upon paragraph 7 of the stipulation of settlement dated January 25, 1989, as incorporated in subsequent orders, and is made in accordance with rule 7(b), F.R.Civ.P., and rule 3 of the local civil rules. E.O.D. 4/2/96 DJT.</p>	
3/29/96	81	<p>FLd...PLAINTIFFS' SUPPORTING MEMORANDUM...On the basis of the foregoing, plaintiffs' respectfully request that the court (1) continue all existing orders in effect for a period to be determined; (2) issue a further order incorporating those provisions of existing orders which have not yet been fully implemented; (3) issue an order in the nature of a permanent injunction which memorializes the continuing obligations of the defendants (4) continue the above mentioned reporting and monitoring requirements in effect for an additional 18 months; or (5) adopt any variation or combination of the foregoing which will ensure full implementation of existing orders and protection of plaintiffs' legitimate continuing expectations. Plaintiffs also request the award of such other, further or different relief which the court deems just and proper. E.O.D. 4/1/96 DJT.</p>	

CIVIL DOCKET CONTINUATION SHEET

PLAINTIFF		DEFENDANT	DOCKET NO. 84 civ 4163 PAGE 8 OF 9 CES PAGES
DATE	NR.	PROCEEDINGS	
4/1/96	82	Fld. NOTICE OF MOTION...On basis of the attached memorandum and documentation will seek an order extending the effective dates of the stipulation of settlement herein dated January 15, 1989 the agreement and order herein date November 19, 1991 and the stipulation and order herein dated March 3, 1993; granting additional or alternative relief as set forth in the attached memorandum; and awarding such other, further; and different relief as the court may deem appropriate. E.O.D. 4/4/96 DJT	
<del>4/1/96</del>	83	Fld. PLAINTIFFS' SUPPORTING MEMORANDUM...On the basis of the foregoing, plaintiffs respectfully request that the court (1) continue all existing orders in effect for a period to be determined; (2) issue a further order incorporating those provisions of existing orders which have not yet been fully implemented; (3) issue an order in the nature of a permanent injunction which memorializes the continuing obligations of the defendants; (4) continue the above mentioned reporting and monitoring requirements in effect for an additional 18 months; or (5) adopt any variation or combination of the foregoing which will ensure full implementation of existing orders and protection of plaintiffs' legitimate continuing expectstions. Plaintiffs also request the award of such other, further or different relief which the court deems just and proper. E.O.D 4/4/96 DJT	
4/1/96	84	Fld. DECLARATION OF MYRA SINCOFF...I Myyra Sincoff make this declaration in connection with plaintiffs' motion of March 28, 1996 to continue the current orders in force nthis case and for other relief to preserve our class members' rights and to ensure that all provisions of these orders are fully implemented. E.O.D. 4/4/96 DJT.	
4/11/96	85	Fld... NOTICE OF WITHDRAWAL OF MOTION...The plaintiffs in the above action hereby withdraw theie motion herein dated March 28, 1996, which sought, inter alia, to extend the effective date of certain existing orders in this case. E.O.D. 4/22/96 DJT.	