

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

RONALD PAUL ADAMS, et al.,)
) Plaintiffs,)
 UNITED STATES OF AMERICA,)
) Plaintiffs-Intervenor,)
 vs.) CIVIL ACTION NO. 74-70-S
 NATHAN MATHIS, et al.,)
) Defendants.)

PLAINTIFFS' RESPONSE TO DEFENDANT'S
MOTION TO TERMINATE COURT ORDERS PURSUANT
TO THE PRISON LITIGATION REFORM ACT

COMES NOW the Plaintiffs, by and through their undersigned attorney and in response the Defendant's Motion to Terminate Court Orders Pursuant to the Prison Litigation Reform Act states as follows:

1. The Plaintiffs adopts the response of the United States of America styled United States' Opposition to Defendant's Motion to Terminate Court Orders Pursuant to the Prison Litigation Reform Act as through it were fully set out herein.

2. The Defendants and/or their successors have never shown compliance with the Consent Decree.

3. Further, the attorney for the Plaintiffs makes known to the Court that the former Houston County Jail, not being presently used, is now being considered because of the overflow in the existing jail.

WHEREFORE, the above premises considered, the Plaintiffs move the Court to deny the Defendant's Motion to Terminate Consent Decree and Other Prospective Relief.

Dated this the 4 day of August, 1997.

Joel M. Nomberg

 JOEL M. NOMBERG
 ATTORNEY FOR PLAINTIFFS
 1816 WEST MAIN STREET
 DOTHAN, ALABAMA
 334-793-6493

Adams & U.S. v. Mathis



JC-AL-002-007

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of August, 1997, served a copy of the foregoing by placing said copy in the U. S. Mail, first class, postage prepaid and properly addressed to:

Hon. Redding Pitt, United States Attorney
Hon. Isabelle Katz Pinzler, AUSA
Hon. Steven H. Rosenbaum, AUSA
Hon. William G. Maddox, AUSA
Hon. Margo J. Schlanger, AUSA
Post Office Box 197
Montgomery, Alabama 36101-0197

Alice Ann Byrne
Ellen Leonard
Kim Thomas
Assistant Attorney Generals
State of Alabama
Post Office Box 301501
Montgomery, Alabama 36130

Dr. Sibley Turner, Chairman
Houston County Board of Health
1900 Fairview Ave.
Dothan, Alabama 36301

Dr. William Lightfoot, Chairman
Alabama State Committee of Public Health
Department of Public Health
RSA Tower
201 Monroe Street, Suite 1552
Montgomery, Alabama 36104

John Robinson
Alabama State Fire Marshall
Post Office Box 3033352
Montgomery, Alabama 36130-3352


OF counsel