



JC-DC-001-045

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA


| | | |
|-------------------------------|---|------------------|
| LEONARD CAMPBELL, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | C.A. No. 1462-71 |
| |) | |
| ANDERSON McGRUDER, et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |
| INMATES OF D.C. JAIL, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | C.A. No. 75-1668 |
| |) | |
| DELBERT C. JACKSON, et al., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

MEMORANDUM IN SUPPORT OF JOINT MOTION TO AMEND
THE STIPULATION AND ORDER OF AUGUST 22, 1985

The order of this Court dated August 22, 1985, provides that a medical expert shall be appointed by each of the parties "to review the health services delivery system at the D.C. Jail and make recommendations for improvements in the report to be submitted to the Court and the parties by November 1, 1985, and implemented by March 1, 1986, unless good cause is shown by either party why they should not be". The experts have now completed their studies and are in the process of preparing their reports. The defendants' expert, Dr. Bernard Harrison, has requested that separate reports be prepared by the experts. Plaintiffs' expert, Dr. Robert L. Cohen, suggested that the

experts exchange draft reports prior to submission of the reports to the Court. This exchange of drafts will necessitate additional time but hopefully will result in a work-product which will reconcile and harmonize the recommendations of the experts and lead to a consensus on as many items as possible. Therefore, the parties have agreed, subject to the Court's approval, to an enlargement of the time for submission of the final reports to December 1, 1985.

Respectfully submitted,


Mary E. McClymont
Steven Ney
Alvin J. Bronstein
ACLU National Prison Project
1616 P Street, NW
Suite 340
Washington, D.C. 20036
(202) 331-0500

Counsel for Plaintiffs
in Inmates v. Jackson

J. Patrick Hickey
John H. More
Douglas Hilleboe
Shaw, Pittman, Potts &
Trowbridge
1800 M Street, NW
Washington, D.C. 20036
(202) 822-1000

Counsel for Plaintiffs
in Campbell v. McGruder