

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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JUAN F., <i>et al.</i> ,)	
Plaintiffs,)	
)	
v.)	CIVIL NO. H89-859 (CFD)
)	
M. JODI RELL, <i>et al.</i> ,)	
)	
Defendants.)	
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**PLAINTIFFS’ MOTION FOR A TEMPORARY RESTRAINING
ORDER AND PRELIMINARY AND PERMANENT INJUNCTION TO
ENJOIN DEFENDANTS FROM SUSPENDING
NEW INTAKES TO THE VOLUNTARY SERVICES PROGRAM**

Plaintiffs respectfully move this Court, pursuant to the Revised Exit Plan entered July 12, 2006, the Revised Monitoring Order entered October 12, 2005, and Federal Rule of Civil Procedure 65, for a temporary restraining order, a preliminary injunction, and a permanent injunction enjoining Defendants from suspending new intakes to the Voluntary Services Program (“VSP”) as set forth below.

This Motion is supported by an accompanying Memorandum of Law in Support of Plaintiffs’ Motion for a Temporary Restraining Order and Preliminary and Permanent Injunction to Enjoin Defendants from Suspending New Intakes to the Voluntary Services Program (with exhibits).

As explained more fully in Plaintiffs’ accompanying memorandum of law, an injunction is necessary to prevent irreparable harm to “at risk” children in the *Juan F.* class who require community-based or temporary out-of-home placement and whose treatment needs cannot be met through services currently available to their parent or guardian and who might otherwise be

/s/ Steven M. Frederick

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FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that, on December 8, 2009, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF system for filing and transmittal of Notice of Electronic Filing to the following ECF registrant:

ANN RUBIN
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DATED: December 8, 2009

/s/

Steven M. Frederick