

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

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| INMATES OF THE RHODE ISLAND |) | |
| TRAINING SCHOOL, |) | C.A. No. 71-4529-L |
| |) | |
| Plaintiffs, |) | |
| |) | STIPULATION REGARDING |
| |) | ACCESS TO & CONFIDENTIALITY |
| v. |) | OF PLAINTIFFS' PROTECTED |
| |) | INFORMATION |
| JANICE DEFRANCES, ET AL., |) | |
| |) | |
| Defendants. |) | |
| <hr style="border: 1px solid black;"/> |) | |

To enable the parties' experts from the Center for Children's Law & Policy (CCLP) to adequately inspect the Rhode Island Training School (RITS), interview residents, examine relevant documents and ultimately determine whether or not RITS is in substantial compliance with the JDAI+ standards (hereinafter "JDAI+ inspection"), the parties hereby stipulate that the Court may enter the following protective order without hearing or notice:

1. Employees and consultants of CCLP shall have access to records in the possession and control of the RITS and the Rhode Island Department of Children, Youth, and Families (DCYF) that relate to the class members or former class members at the RITS, and that might otherwise be subject to confidentiality restrictions.
2. Employees and consultants of CCLP may interview staff and youth on site at RITS for the purpose of conducting the JDAI+ inspection, subject to the terms of this Order.
3. Any employee or consultant of CCLP, who may have access to the confidential records or disclosures of the youth currently or formerly at RITS as part of the JDAI+ inspection, shall be provided with a copy of, and agree in writing to become subject to, the provisions of this Order requiring that protected information about youth, including the

names of youth, be held in confidence.

4. Any report generated as a result of the JDAI+ inspection shall not be circulated publicly with the names of youth or any information which could easily lead to the identification of a youth.
5. All persons allowed access to confidential information pursuant to this agreement shall take reasonable and necessary measures to maintain the confidentiality of such information, and are prohibited from using or disclosing confidential information for any purposes other than the JDAI+ inspection.

Dated: June 13, 2014

/s/Amy Fettig

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Counsel for Defendants

IT IS SO ORDERED:

DATED: June ___, 2014

HON. RONALD R. LAGUEUX
SR. UNITED STATES DISTRICT JUDGE