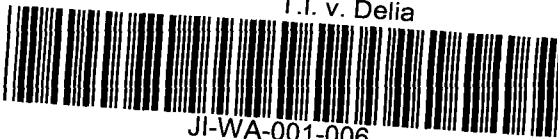


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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

T.I., a minor, by and through
his mother and next friend,
D.I.; W.F., a minor, by and
through his mother and next
friend, O.T.; D.I., a minor,
by and through his mother and
next friend, C.I., On Behalf
Of Themselves and Others
Similarly Situated,

NO. 90-2-16125-1

PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION
RE: DORM SCHOOL

Plaintiffs,

v.

HAROLD DELIA, Director,
DEPARTMENT OF YOUTH SERVICES,
et al.,

Defendants.

RELIEF REQUESTED

Pursuant to CR 65(a) and RCW 7.40.020, plaintiffs ask this
Court to enjoin defendants from removing youth from detention
school and placing them in "dorm school" or "mid school" due to
the lack of space in detention classrooms or for punishment for
out-of-school behavior.

STATEMENT OF FACTS

PLAINTIFF'S MOTION FOR PRELIMINARY
INJUNCTION RE: DORM SCHOOL - 1

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1 The facts supporting this motion are contained in the
2 Plaintiffs' Memorandum in Support of Their Motion for Preliminary
3 Injunction filed herewith.

4 STATEMENT OF ISSUES

5 (1) Whether this court should preliminarily enjoin
6 defendants from removing youth in detention from the regular
7 school program and placing them in dorm school or mid school due
8 to the lack of space in detention classrooms to accommodate the
9 detention population.

10 (2) Whether defendants should be preliminarily enjoined from
11 removing detained youth from the regular detention school program
12 and placing them in dorm school or mid school to punish them for
13 out-of-school behavior that is unrelated to their conduct in
14 school.

15 (3) Whether defendants should be preliminarily enjoined from
16 suspending or expelling detained youth from the regular detention
17 school program without providing the same procedural protections
18 afforded to students attending Seattle Public Schools who are not
19 in detention.

20 EVIDENCE RELIED UPON

21 This motion is based upon the Declaration of Patricia J.
22 Arthur and the Exhibits appended thereto, filed with Plaintiffs'
23 Memorandum In Support Of Their Motion For Preliminary Injunction.

24 AUTHORITY

25 The legal authority for this motion is set forth in
26 Plaintiffs' Memorandum in Support of Preliminary Injunction filed
27 herewith.

28 PLAINTIFF'S MOTION FOR PRELIMINARY
INJUNCTION RE: DORM SCHOOL - 2

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Respectfully submitted this 17th day of October, 1990.

EVERGREEN LEGAL SERVICES

By *Patricia J. Arthur*
PATRICIA J. ARTHUR, WSBA #13769
JOHN MIDGLEY, WSBA #6511
Attorneys for Plaintiffs
T.I. and D.I.

HELLER, EHRMAN, WHILE & MCAULIFFE

By *John W. Phillips (by PWP)*
WSBA #12181
John W. Phillips
Attorneys for Plaintiff W.F.

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PLAINTIFF'S MOTION FOR PRELIMINARY
INJUNCTION RE: DORM SCHOOL - 3

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