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CIVIL TRACK I  
JUDGE DIXON

FILED  
1991 MAY 22 PM 4:07  
KING COUNTY  
COURT CLERK  
SEATTLE, WA

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  
AN INJUNCTION

Plaintiffs,

vs.

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

Defendants.

This motion is brought pursuant to CR 65. Plaintiffs ask this court to restrain the county defendants from placing more than a total of seventy-one youth in the Alder building at the King County detention facility (KCDF), and from placing more than two youth in any multiple-person cell. Plaintiffs also ask this court to enjoin defendants from using the holding cells located behind the courtroom at the KCDF as sleeping cells or to punish youth. Plaintiffs further ask this Court to require the King

PLAINTIFFS' MOTION FOR  
AN INJUNCTION-  
Page 1

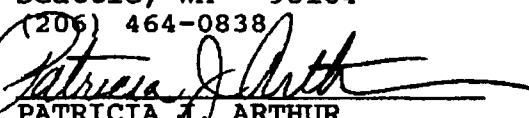
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1 County defendants to staff the KCDF at a level that reasonably  
2 insures the safety of youth there. Finally, plaintiffs seek an  
3 injunction restraining the King County defendants from denying  
4 youth at the KCDF the opportunity for reasonable exercise,  
5 outdoors weather permitting.

6 Plaintiffs seek this injunction because youth in detention  
7 have been, and will continue to be, seriously injured if action is  
8 not taken by this court.

9 This motion is supported by the accompanying memorandum,  
10 declarations and exhibits filed herewith.

11 DATED: May 22, 1991

12  
13 Respectfully submitted,  
14  
15 EVERGREEN LEGAL SERVICES  
16 Institutional Legal Services  
17 Project  
18 101 Yesler Way, Suite 301  
19 Seattle, WA 98104  
20 (206) 464-0838  
21   
22 PATRICIA J. ARTHUR  
23 WSBA #13769  
24 JOHN MIDDLEY  
25 WSBA #6511  
26 On Behalf Of Plaintiffs  
27 T.I. and D.I.

28 HELLER, EHRMAN, WHITE &  
MCAULIFFE  
6100 Columbia Center  
Seattle, WA 98104  
(206) 447-0900  
  
JOHN W. PHILLIPS  
WSBA #12185  
BLAIR C. STONE  
WSBA #17741  
On Behalf of Plaintiff W.F.