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RECEIVED
AUG 16 1996
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA
DEPUTY

THE HONORABLE ROBERT J. BRYAN

RECEIVED
AUG 26 1996
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA
DEPUTY

ENTERED
ON DOCKET
AUG 28 1996

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JAMES HORTON, et al.,)	
)	CLASS ACTION
Plaintiffs,)	
)	No. C94-5428 RJB
vs.)	
)	NOTICE OF PROPOSED SETTLEMENT
BOB WILLIAMS, et al.,)	OF CLASS ACTION LAWSUIT
)	
Defendants.)	
_____)	

IMPORTANT NOTICE TO ALL RESIDENTS OF GREEN HILL SCHOOL:

On August 16, 1996, a proposed settlement of the remainder of plaintiffs' claims against the State defendants was filed with this Court. The proposed settlement is called a "Supplemental Stipulation and Judgment." This Notice is to advise you about the terms of the Supplemental Stipulation and Judgment and to explain how to file written objections to it, if you have any. Final approval of the settlement by the Court is required and will be subject to the Court's review of objections filed by residents of Green Hill School (GHS).

This Notice only summarizes the terms of the proposed settlement. A complete copy of the proposed settlement is available upon request in all of the living units at GHS and in the school library.

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1 **I. WHO IS AFFECTED BY THIS NOTICE**

2 The lawsuit and the proposed agreed court order affect all youth housed at GHS, now
3 or in the future.

4 **II. HOW TO FILE OBJECTIONS WITH THE COURT**

5 Any resident may file objections to the proposed settlement by mailing written
6 objections to Clerk of the Court at: U.S. Courthouse, Union Station, 1717 Pacific Avenue,
7 Room 3100, Tacoma, WA 98402-3200. These objections must be mailed by September 15,
8 1996, and should reference the case number, USDC-WD No. 5428 RJB. After reviewing
9 any objections filed by residents, the Court will determine whether to accept the proposed
10 settlement.
11

12 **III. SUMMARY OF THE PROPOSED SETTLEMENT**

13 1. The proposed Supplemental Stipulation & Judgment requires the State
14 defendants to retain consultants to review the mental health services and treatment programs
15 available to youth at GHS, and to develop a remedial plan to insure that the mental health
16 services and treatment programs available to youth at GHS comply with relevant legal
17 standards.
18

19 2. The proposed Supplemental Stipulation and Judgment requires the State
20 defendants to comply with all relevant state and federal laws in accommodating the mental
21 disabilities of youth at GHS.
22

23 3. The proposed settlement further requires the State defendants to provide youth
24 at GHS with access to appropriate mental health services.
25

26 4. It also requires the State defendants to perform mental health screens on youth
27 in lock-up for safety (as opposed to disciplinary) reasons for more than 72 hours, and to
28 make appropriate mental health treatment available to youth in lock-up.

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5. The proposed Supplemental Stipulation and Judgment prohibits the State from using lock-up for juveniles with acute mental illness in any manner inconsistent with State or federal law.

6. The proposed settlement requires the State defendants to give youth access to qualified staff to evaluate for mental health needs and to provide access to mental health treatment in a timely manner.

7. The State defendants are required to administer anti-psychotic medications only if medically appropriate and only as consistent with relevant law.

8. The proposed settlement requires GHS to document all resident refusals of mental health treatment and to get the resident's written confirmation of the refusal.

9. The Supplemental Stipulation and Judgment requires the State defendants to develop a revised policy related to the administration of psychotropic drugs.

10. An independent monitor will help the plaintiffs' attorneys make sure that the defendants do what they are supposed to do under the terms of the settlement.

11. The court will maintain jurisdiction over the case for four years to make sure the defendants meet their obligations under the Supplemental Stipulation and Judgment.

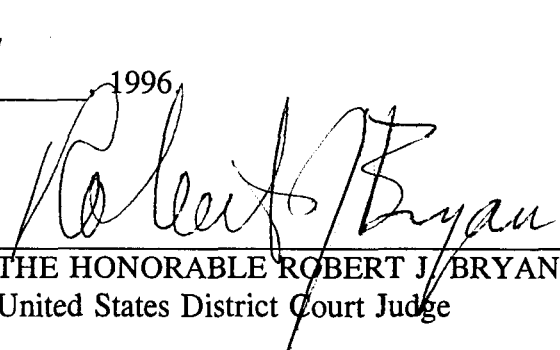
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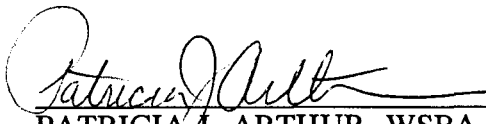
12. The settlement provides that the amount of attorneys fees to be awarded plaintiffs' counsel will be determined by separate agreement or court order.

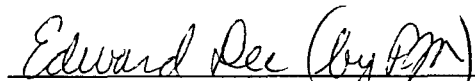
YOU MAY DIRECT QUESTIONS ABOUT THIS CASE TO PLAINTIFFS' COUNSEL
PATRICIA ARTHUR AT: COLUMBIA LEGAL SERVICES, INSTITUTIONAL LEGAL
SERVICES PROJECT, 101 YESLER WAY, SUITE 301, SEATTLE, WA 98104;
(206)382-3399 (COLLECT LINE).

DATED this 26 day of Aug 1996


THE HONORABLE ROBERT J. BRYAN
United States District Court Judge

Agreed To By:


PATRICIA J. ARTHUR, WSBA #13769
ROBERT A. STALKER, JR., WSBA #13650
Of Attorneys for Plaintiffs


EDWARD J. DEE, WSBA #15964
Assistant Attorney General
Attorney for State Defendants
(Approved Per Telephonic Approval)