

**U.S. District Court
Southern District of Alabama (Selma)
CIVIL DOCKET FOR CASE #: 2:13-cv-00519-CG-B**

Alabama Disabilities Advocacy Program v. SafetyNet
YouthCare, Inc.
Assigned to: Senior Judge Callie V. S. Granade
Referred to: Magistrate Judge Sonja F. Bivins
Cause: Disability Act of 1990

Date Filed: 10/25/2013
Date Terminated: 12/15/2014
Jury Demand: None
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: Federal Question

Plaintiff

**Alabama Disabilities Advocacy
Program**

represented by **David John Slawkowski**
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

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V.

Defendant

SafetyNet YouthCare, Inc.

represented by **Martha Leach Thompson**
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 ATTORNEY TO BE NOTICED

V.

Non-Party

UNITED STATES OF AMERICA

represented by **Holly Lee Wiseman**
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ThirdParty Plaintiff

SafetyNet YouthCare, Inc.

represented by **Martha Leach Thompson**
 (See above for address)
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

Stewart W. McCloud
 (See above for address)
 ATTORNEY TO BE NOTICED

V.

ThirdParty Defendant

**Alabama Department of Human
 Resources (DHR)**

represented by **Felicia Marshea Brooks**
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Date Filed	#	Docket Text
10/25/2013	<u>1</u>	COMPLAINT against All Defendants (Filing fee \$400 receipt number 1128-1502846, Online Credit Card Payment), filed by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Exhibit Exhibits 1-8, # <u>2</u> Waiver of Service, # <u>3</u> Civil Cover Sheet) (Slawkowski, David) (Attachment 1 replaced on 3/21/2014) (mjn). (Entered: 10/25/2013)
11/04/2013	<u>2</u>	Service Notice issued 11/4/2013. Plaintiff's Notice of Service Efforts due by 12/9/2013 pursuant to Local Rule 4.1(c). (mab) (Entered: 11/04/2013)
11/05/2013	<u>3</u>	NOTICE of Filing Proposed Summons by Alabama Disabilities Advocacy Program (Slawkowski, David) (Entered: 11/05/2013)
11/05/2013	<u>4</u>	Summons Issued as to SafetyNet YouthCare, Inc. (NOTE TO COUNSEL: The Summons has been issued. Please print copies necessary for service.) (mab) (Entered: 11/05/2013)
11/19/2013	<u>5</u>	SUMMONS Returned Executed by Alabama Disabilities Advocacy Program. SafetyNet YouthCare, Inc. served on 11/11/2013, answer due 12/2/2013. (Slawkowski, David) (Entered: 11/19/2013)

11/27/2013	<u>6</u>	NOTICE of Appearance by Andrea Jane Mixson on behalf of Alabama Disabilities Advocacy Program (Mixson, Andrea) (Entered: 11/27/2013)
12/02/2013	<u>7</u>	ANSWER to <u>1</u> Complaint, by SafetyNet YouthCare, Inc.. (Thompson, Martha) (Entered: 12/02/2013)
12/02/2013	<u>8</u>	THIRD PARTY COMPLAINT against Alabama Department of Human Resources (DHR), filed by SafetyNet YouthCare, Inc.. (Thompson, Martha) (Entered: 12/02/2013)
12/03/2013	<u>9</u>	PRELIMINARY SCHEDULING ORDER entered. Rule 26 Meeting Report due by 1/17/2014.Signed by Magistrate Judge Sonja F. Bivins on 12/3/2013. (Attachment: # <u>1</u> consent form) (mab) (Main Document 9 replaced on 12/3/2013) (mab). (Entered: 12/03/2013)
12/03/2013	<u>10</u>	Third-Party Summons Issued as to Alabama Department of Human Resources (DHR). (NOTE TO COUNSEL: The Third-Party Summons has been issued. Please print copies necessary for service.) (mab) (Entered: 12/03/2013)
12/10/2013	<u>11</u>	SUMMONS Returned Executed by SafetyNet YouthCare, Inc.. Alabama Department of Human Resources (DHR) served on 12/4/2013, answer due 12/26/2013. (Thompson, Martha) (Entered: 12/10/2013)
12/20/2013	<u>12</u>	NOTICE of Appearance by Felicia Marshea Brooks on behalf of Alabama Department of Human Resources (DHR) (Brooks, Felicia) (Entered: 12/20/2013)
12/20/2013	<u>13</u>	Corporate Disclosure Statement filed by ThirdParty Defendant Alabama Department of Human Resources (DHR). (Brooks, Felicia) (Entered: 12/20/2013)
12/20/2013	<u>14</u>	Document endorsed NOTED by Magistrate Judge Sonja F. Bivins: Corporate Disclosure Statement <u>13</u> filed by Alabama Department of Human Resources (DHR). (Bivins, Sonja) (Entered: 12/20/2013)
12/22/2013	<u>15</u>	ANSWER to <u>8</u> Third Party Complaint by Alabama Department of Human Resources (DHR). (Brooks, Felicia) (Entered: 12/22/2013)
12/23/2013	<u>16</u>	Document endorsed NOTED by Judge Callie V. S. Granade: Corporate Disclosure Statement <u>13</u> filed by Alabama Department of Human Resources (DHR) (McDermott, Elizabeth) (Entered: 12/23/2013)
01/08/2014	<u>17</u>	Corporate Disclosure Statement filed by Defendant SafetyNet YouthCare, Inc.. (Thompson, Martha) (Entered: 01/08/2014)
01/08/2014	<u>18</u>	Document endorsed NOTED by Judge Callie V. S. Granade: Corporate Disclosure Statement <u>17</u> filed by SafetyNet YouthCare, Inc. (McDermott, Elizabeth) (Entered: 01/08/2014)
01/08/2014	<u>19</u>	Document endorsed NOTED by Magistrate Judge Sonja F. Bivins: Corporate Disclosure Statement <u>17</u> filed by SafetyNet YouthCare, Inc. (Bivins, Sonja) (Entered: 01/08/2014)
01/17/2014	<u>20</u>	REPORT of Rule 26(f) Planning Meeting . (Mixson, Andrea) (Entered: 01/17/2014)
01/20/2014	<u>21</u>	NOTICE of Endorsement by SafetyNet YouthCare, Inc. (Thompson, Martha) (Entered: 01/20/2014)
01/21/2014	<u>22</u>	NOTICE of Endorsement by Alabama Department of Human Resources (DHR) (Brooks, Felicia) (Entered: 01/21/2014)
01/22/2014	<u>23</u>	Order re: <u>20</u> Report of Rule 26(f) Planning Meeting filed by Alabama Disabilities Advocacy Program. Status Conference set for 2/4/2014 at 10:00 AM in US Courthouse, Courtroom 1A, 113 St. Joseph Street, Mobile, AL 36602 before Magistrate Judge Sonja F. Bivins. Signed by Magistrate Judge Sonja F. Bivins on 1/22/2014. copies to parties & emailed to CRD. (sdb) (Entered: 01/22/2014)
01/31/2014	<u>24</u>	MOTION for William Van Der Pol, Jr. to Appear Pro Hac Vice (Filing fee \$ 50, Receipt number 1128-1538586, Online Credit Card Payment.) by Alabama Disabilities Advocacy Program. (Van Der Pol, William) (Entered: 01/31/2014)

01/31/2014	<u>25</u>	NOTICE of Filing Exhibits <i>Application Documents for Pro Hac Vice Appearance</i> by Alabama Disabilities Advocacy Program re: <u>24</u> MOTION for William Van Der Pol, Jr. to Appear Pro Hac Vice (Filing fee \$ 50, Receipt number 1128-1538586, Online Credit Card Payment.) filed by Alabama Disabilities Advocacy Program. (Van Der Pol, William) (Entered: 01/31/2014)
01/31/2014	<u>26</u>	Notice of Filing Initial Disclosures filed by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 01/31/2014)
02/04/2014		Minute Entry for proceedings held before Magistrate Judge Sonja F. Bivins: A status conference was conducted on 2/4/2014, with counsel for the parties attending by telephone. (kpt) (Entered: 02/04/2014)
02/04/2014	<u>27</u>	RULE 16(b) SCHEDULING ORDER: Pretrial Conference set for 11/10/2014 at 1:30 PM in US Courthouse, Judge's Chambers, 113 St. Joseph Street, Mobile, AL 36602 before Judge Callie V. S. Granade. Motions for leave to amend pleadings due by 2/28/2014. Discovery cutoff 6/30/2014. Dispositive Motions due by 7/18/2014. Bench Trial set for the December 2014 trial term before Judge Callie V. S. Granade. ETT 3 days. Joint Position Regarding Settlement due by 6/30/2014. Joint Proposed Protective Order due by 2/18/2014. Signed by Magistrate Judge Sonja F. Bivins on 2/4/2014. (Attachment: # <u>1</u> Judge Granade's Standing Pretrial Order) (mab) (Entered: 02/04/2014)
02/18/2014	<u>28</u>	NOTICE of Filing Proposed Order by Alabama Disabilities Advocacy Program re: <u>27</u> Scheduling Order., <i>Notice and Text of Joint Proposed Protective Order with Proposed Non-Disclosure Agreement</i> (Mixson, Andrea) (Entered: 02/18/2014)
02/19/2014	<u>29</u>	MOTION to Amend <u>28</u> Joint Proposed Protective Order and Non-Disclosure Agreement by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Text of Proposed Order) (Mixson, Andrea) (Entered: 02/19/2014)
02/20/2014	<u>30</u>	AMENDED PROTECTIVE ORDER entered. Signed by Magistrate Judge Sonja F. Bivins on 2/19/2014. (srr) (Main Document 30 replaced on 5/9/2014) (mab). (Entered: 02/20/2014)
03/21/2014	<u>31</u>	Notice of Filing Requests for Admisson filed by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 03/21/2014)
04/11/2014	<u>32</u>	ENDORSED ORDER Denying, without prejudice [Doc. 24] Motion to Appear Pro Hac Vice filed by William Van Der Pol, Jr. Despite numerous requests from the court, counsel has failed to provide the requisite documentation. Accordingly, the motion is denied, without prejudice. Signed by Magistrate Judge Sonja F. Bivins on 4/11/2014. (kpt) (Entered: 04/11/2014)
04/24/2014	<u>33</u>	NOTICE of Appearance by Nancy Ellen Anderson on behalf of Alabama Disabilities Advocacy Program (Anderson, Nancy) (Entered: 04/24/2014)
05/05/2014	<u>34</u>	MOTION for Extension of Time to Complete Discovery by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Superseded by Doc. <u>35</u> .) (Entered: 05/05/2014)
05/05/2014	<u>35</u>	Corrected MOTION for Extension of Time to Complete Discovery by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 05/05/2014)
05/07/2014	<u>36</u>	ORDER, granting <u>35</u> MOTION for Extension of Time filed by Alabama Disabilities Advocacy Program. Plaintiff's expert disclosures due 5/12/2014. Defendants' expert disclosures due 6/12/2014. Discovery cutoff 7/15/2014., Dispositive Motions due by 7/31/2014. Joint Position Regarding Settlement due by 7/15/2014. All other deadlines contained in the <u>27</u> rule 16(b) scheduling order remain in full force and effect. Signed by Magistrate Judge Sonja F. Bivins on 5/7/2014. (mab) (Entered: 05/07/2014)
05/12/2014	<u>37</u>	Notice of Filing Expert Witness Report filed by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 05/12/2014)
05/29/2014	<u>38</u>	Notice of Filing Requests for Production filed by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 05/29/2014)

06/26/2014	<u>39</u>	Notice of Filing Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action filed by Alabama Department of Human Resources (DHR). (Attachments: # <u>1</u> Exhibit) (Brooks, Felicia) (Entered: 06/26/2014)
06/30/2014	<u>40</u>	MOTION for Protective Order <i>Regarding Third Party Defendant DHR's SUBPOENA OR Motion to Quash Subpoena</i> by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Exhibit 1, 2) (Mixson, Andrea) (Entered: 06/30/2014)
07/07/2014	<u>41</u>	Objection re: <u>40</u> MOTION for Protective Order <i>Regarding Third Party Defendant DHR's SUBPOENA OR Motion to Quash Subpoena</i> OBJECTION TO PLAINTIFFS MOTION FOR PROTECTIVE ORDER BY THIRD-PARTY DEFENDANT filed by Alabama Department of Human Resources (DHR). (Attachments: # <u>1</u> Exhibit Exhibit A, # <u>2</u> Exhibit Exhibit B, # <u>3</u> Exhibit Exhibit C, # <u>4</u> Exhibit Exhibit D) (Brooks, Felicia) (Entered: 07/07/2014)
07/10/2014	<u>42</u>	MOTION for Extension of Time by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 07/10/2014)
07/11/2014	43	NOTICE of Hearing: Telephone Conference set for 7/14/2014 09:00 AM in US Courthouse, Courtroom 1A, 113 St. Joseph Street, Mobile, AL 36602 before Magistrate Judge Sonja F. Bivins. Counsel will be notified by separate e-mail the call in number and pass code to access the conference. (mjn) (Entered: 07/11/2014)
07/14/2014		Minute Entry for proceedings held before Magistrate Judge Sonja F. Bivins: Telephone Conference held on 7/14/2014 re; motion for protective order <u>40</u> and motion for extension of time <u>42</u> ; Counsel participating by telephone; Nancy Anderson, Andrea Mixson, Martha Thompson and Felicia Brooks FTR Digital Audio Recording. (mjn) (Entered: 07/14/2014)
07/14/2014	<u>45</u>	Order re: <u>40</u> MOTION for Protective Order filed by Alabama Disabilities Advocacy Program, and the parties' <u>42</u> MOTION for Extension of Time. Discovery conference conducted 7/14/2014. Non-party Alabama Department of Mental Health is ORDERED to produce for an in camera inspection the records as set out in order and deliver documents to chambers no later than 7/18/2014. Parties' motion for an extension is GRANTED in part, and DENIED in part. Pretrial Conference set for 2/9/2015 at 9:30 AM in US Courthouse, Judge's Chambers, 113 St. Joseph Street, Mobile, AL 36602 before Judge Callie V. S. Granade. Non-jury trial set for the March 2015 trial term. ETT 3 days. Discovery cutoff 8/29/2014. Dispositive Motions due by 9/19/2014. Joint Position Regarding Settlement due by 8/29/2014. Except as otherwise provided herein, all other deadlines contained in the <u>27</u> scheduling order entered on 2/42/014 remain in full effect.. Signed by Magistrate Judge Sonja F. Bivins on 7/14/2014. (Entered: 07/14/2014)
07/21/2014	<u>46</u>	ORDER granting in part and denying in part <u>40</u> Motion for Protective Order or in the alternative motion to quash subpoena as set out in order. Signed by Magistrate Judge Sonja F. Bivins on 7/21/2014. (mab) (Entered: 07/21/2014)
07/30/2014	<u>47</u>	NOTICE of Appearance by Stewart D. McCloud on behalf of SafetyNet YouthCare, Inc. (McCloud, Stewart) (Entered: 07/30/2014)
08/21/2014	<u>48</u>	MOTION to Compel <i>Production by Third Party Defendant, Alabama Department of Human Resources</i> by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Exhibit, # <u>3</u> Exhibit) (Mixson, Andrea) (Entered: 08/21/2014)
08/21/2014		MOTIONS REFERRED: <u>48</u> MOTION to Compel <i>Production by Third Party Defendant, Alabama Department of Human Resources</i> Referred to Judge Sonja F. Bivins. (mab) (Entered: 08/21/2014)
08/22/2014	<u>49</u>	Order re: Plaintiff's <u>48</u> MOTION to Compel Alabama Department of Human Resources ("DHR") to properly respond to Plaintiff's first production request. DHR is directed to file a response by 8/29/2014. Signed by Magistrate Judge Sonja F. Bivins on 8/22/2014. (mab) (Entered: 08/22/2014)
08/28/2014	<u>50</u>	Joint Position Regarding Settlement filed by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 08/28/2014)

08/29/2014	51	Document endorsed NOTED by Magistrate Judge Sonja F. Bivins: Position Regarding Settlement <u>50</u> filed by Alabama Disabilities Advocacy Program. (Bivins, Sonja) (Entered: 08/29/2014)
08/29/2014	<u>52</u>	RESPONSE in Opposition re <u>48</u> MOTION to Compel <i>Production by Third Party Defendant, Alabama Department of Human Resources</i> filed by Alabama Department of Human Resources (DHR). (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3, # <u>4</u> Exhibit 4, # <u>5</u> Exhibit 5, # <u>6</u> Exhibit 6, # <u>7</u> Exhibit 7, # <u>8</u> Exhibit 8) (Brooks, Felicia) (Entered: 08/29/2014)
08/29/2014	<u>53</u>	MOTION to Compel Discovery <i>Against Defendant SafetyNet YouthCare, Inc.</i> by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Exhibit A) (Mixson, Andrea) (Entered: 08/29/2014)
09/02/2014		MOTIONS REFERRED: <u>53</u> MOTION to Compel Production of Documents Against SafetyNet YouthCare, Inc. referred to Judge Sonja F. Bivins. (tot) (Entered: 09/02/2014)
09/02/2014	<u>54</u>	Order re: <u>53</u> MOTION to Compel Discovery <i>Against Defendant SafetyNet YouthCare, Inc.</i> filed by Alabama Disabilities Advocacy Program; Defendant Safetynet Youth Care, Inc. is directed to file a response by September 9, 2014. (Responses due by 9/9/2014). Signed by Magistrate Judge Sonja F. Bivins on 9/2/2014. (mjn) (Entered: 09/02/2014)
09/03/2014	<u>55</u>	MOTION to Withdraw <u>53</u> MOTION to Compel Discovery <i>Against Defendant SafetyNet YouthCare, Inc.</i> by Alabama Disabilities Advocacy Program. (Mixson, Andrea) (Entered: 09/03/2014)
09/04/2014		MOTIONS REFERRED: <u>55</u> MOTION to Withdraw <u>53</u> MOTION to Compel Discovery Against Defendant SafetyNet YouthCare, Inc. referred to Judge Sonja F. Bivins. (tot) (Entered: 09/04/2014)
09/04/2014	56	ENDORSED ORDER granting [Doc. 55] Plaintiff's Motion to Withdraw its Motion to Compel. Signed by Magistrate Judge Sonja F. Bivins on 9/4/2014. (kpt) (Entered: 09/04/2014)
09/15/2014	<u>57</u>	MOTION for Leave to File Excess Pages by Alabama Department of Human Resources (DHR). (Brooks, Felicia) (Entered: 09/15/2014)
09/15/2014	58	NOTICE of Hearing: Telephone Conference set for 9/18/2014 11:00 AM in US Courthouse, Courtroom 1A, 113 St. Joseph Street, Mobile, AL 36602 before Magistrate Judge Sonja F. Bivins. Counsel will be notified by separate e-mail the call in number and pass code to access the conference. (mjn) (Entered: 09/15/2014)
09/15/2014		MOTIONS REFERRED: <u>57</u> MOTION for Page Limit Extension for Brief in support of motion for summary judgment; Referred to Judge Callie V. S. Granade. (mab) (Entered: 09/15/2014)
09/16/2014	59	ENDORSED ORDER, GRANTING <u>57</u> DHR's Motion For Page Limit Extension for Brief. DHR's brief in support of its motion for summary judgment shall not exceed fifty (50) pages. Signed by Judge Callie V. S. Granade on 9/16/2014. (mab) (Entered: 09/16/2014)
09/18/2014		Minute Entry for proceedings held before Magistrate Judge Sonja F. Bivins: Telephone Conference held on 9/18/2014. Counsel participating by telephone: David Slawkowski, Nancy Anderson, Andrea Mixson, Stewart McCloud, and Felicia Brooks; FTR Digital Audio Recording. (mjn) (Entered: 09/18/2014)
09/18/2014	61	ENDORSED ORDER granting in part and denying in part Plaintiff's Motion to Compel <u>48</u> . For the reasons stated on the record during the discovery conference conducted on September 18, 2014, Plaintiffs Motion to Compel is granted in part, and denied in part. Within ten (10) days, Third Party Defendant, the Alabama Department of Human Resources, is to review the MAP reports for children placed in SafetyNets Moderate Program between 2012 and 2014, and provide a verified statement listing the diagnoses provided for each child. Said verification shall not include any personal identifying information for said children. Signed by Magistrate Judge Sonja F. Bivins on 9/18/2014. (Bivins, Sonja) (Entered: 09/18/2014)

09/19/2014	<u>62</u>	MOTION for Summary Judgment by SafetyNet YouthCare, Inc.. (Attachments: # <u>1</u> Memorandum Brief in Support of Motion for Summary Judgment, # <u>2</u> Exhibit A, # <u>3</u> Exhibit B, # <u>4</u> Exhibit C, # <u>5</u> Exhibit D, # <u>6</u> Exhibit E, # <u>7</u> Exhibit F, # <u>8</u> Exhibit G) (Thompson, Martha) (Entered: 09/19/2014)
09/19/2014	<u>63</u>	MOTION for Summary Judgment by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Supplement Certificate of Service, # <u>2</u> Supplement Memorandum, # <u>3</u> Exhibit, # <u>4</u> Exhibit, # <u>5</u> Exhibit, # <u>6</u> Exhibit, # <u>7</u> Exhibit, # <u>8</u> Exhibit, # <u>9</u> Text of Proposed Order, # <u>10</u> Exhibit) (Mixson, Andrea) (Entered: 09/19/2014)
09/19/2014	<u>64</u>	MOTION for Summary Judgment by Alabama Department of Human Resources (DHR). (Attachments: # <u>1</u> Text of Proposed Order) (Brooks, Felicia) (Entered: 09/19/2014)
09/19/2014	<u>65</u>	Brief filed by Alabama Department of Human Resources (DHR) filed by Alabama Department of Human Resources (DHR). (Brooks, Felicia) (Entered: 09/19/2014)
09/19/2014	<u>66</u>	Evidentiary Material filed by Alabama Department of Human Resources (DHR) re: <u>64</u> MOTION for Summary Judgment . (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3, # <u>4</u> Exhibit 4, # <u>5</u> Exhibit 5, # <u>6</u> Exhibit 6, # <u>7</u> Exhibit 7, # <u>8</u> Exhibit 8, # <u>9</u> Exhibit 9, # <u>10</u> Exhibit 10, # <u>11</u> Exhibit 11, # <u>12</u> Exhibit 12, # <u>13</u> Exhibit 13, # <u>14</u> Exhibit 14, # <u>15</u> Exhibit 15, # <u>16</u> Exhibit 16A, # <u>17</u> Exhibit 16B, # <u>18</u> Exhibit 17, # <u>19</u> Exhibit 18, # <u>20</u> Exhibit 19) (Brooks, Felicia) (Entered: 09/19/2014)
09/22/2014	<u>67</u>	Order re MOTIONS for Summary Judgment (Docs. <u>62</u> , <u>63</u> , & <u>64</u>), setting response time as follows: Responses to S/J due by 10/10/2014. Replies to Responses to S/J due by 10/24/2014. Motions to be taken under submission on 10/27/2014. Signed by Judge Callie V. S. Granade on 9/22/2014. (mab) (Entered: 09/22/2014)
10/01/2014	<u>68</u>	MOTION to Supplement <i>Motion for Summary Judgment</i> by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Supplement Pl's. Supplemental Memo in Support of MSJ, # <u>2</u> Exhibit Pl's Ex. H) (Mixson, Andrea) (Entered: 10/01/2014)
10/01/2014	<u>69</u>	ENDORSED ORDER, GRANTING <u>68</u> Plaintiff ADAP's Motion to Supplement its Motion for Summary Judgment. Signed by Judge Callie V. S. Granade on 10/1/2014. (mab) (Entered: 10/01/2014)
10/01/2014	<u>70</u>	Supplement to Memorandum in Support of Its <u>63</u> MOTION for Summary Judgment, filed by Alabama Disabilities Advocacy Program. (Attachment: # <u>1</u> Exhibit H – Affidavit of Elizabeth "Betsy" M. King) (mab) (Entered: 10/02/2014)
10/10/2014	<u>71</u>	RESPONSE to <u>64</u> MOTION for Summary Judgment , <u>63</u> MOTION for Summary Judgment filed by SafetyNet YouthCare, Inc.. (Thompson, Martha) (Entered: 10/10/2014)
10/10/2014	<u>72</u>	Memorandum in Opposition re <u>63</u> MOTION for Summary Judgment , <u>70</u> Memorandum in Support filed by Alabama Department of Human Resources (DHR). (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3, # <u>4</u> Exhibit 4) (Brooks, Felicia) (Attachment 3 replaced on 10/16/2014) (mab). (Entered: 10/10/2014)
10/10/2014	<u>73</u>	Memorandum in Opposition re <u>62</u> MOTION for Summary Judgment , <u>65</u> Brief filed by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Appendix A, # <u>2</u> Exhibit Doc. 63–5 (Ex. D), # <u>3</u> Exhibit Doc. 63–6 (Ex. E), # <u>4</u> Exhibit Doc 68–2 (Ex. H)) (Mixson, Andrea) (Entered: 10/10/2014)
10/14/2014	<u>74</u>	Department of Justice Statement of Interest filed by UNITED STATES OF AMERICA (Wiseman, Holly) (Entered: 10/14/2014)
10/24/2014	<u>75</u>	RESPONSE to <u>73</u> Memorandum in Opposition, filed by SafetyNet YouthCare, Inc.. (Thompson, Martha) (Entered: 10/24/2014)
10/24/2014		REFERRAL OF <u>62</u> MOTION for Summary Judgment, <u>73</u> Memorandum in Opposition, and <u>75</u> Reply to Judge Callie V. S. Granade. (mab) (Entered: 10/24/2014)

10/24/2014		REFERRAL OF <u>74</u> Department of Justice Statement of Interest to Judge Granade. (mab) (Entered: 10/24/2014)
10/24/2014	<u>76</u>	REPLY Brief filed by ThirdParty Defendant Alabama Department of Human Resources (DHR) re: <u>71</u> Response by SafetyNet to Motion for SJ filed by Alabama Department of Human Resources (DHR). (Brooks, Felicia) (Entered: 10/24/2014)
10/24/2014	<u>77</u>	REPLY Brief filed by ThirdParty Defendant Alabama Department of Human Resources (DHR) re: <u>74</u> Brief, <u>71</u> Response, <u>73</u> Memorandum in Opposition, filed by Alabama Department of Human Resources (DHR). (Attachments: # <u>1</u> Text of Proposed Order) (Brooks, Felicia) (Entered: 10/24/2014)
11/03/2014		REFERRAL OF <u>63</u> MOTION for Summary Judgment; <u>73</u> Memorandum in Opposition; <u>75</u> Reply by SafetyNet YouthCare, Inc.; and <u>76</u> Reply Brief by Alabama Department of Human Resources to Judge Callie V. S. Granade. (mab) (Entered: 11/03/2014)
11/03/2014		REFERRAL OF: <u>64</u> MOTION for Summary Judgment; <u>71</u> Response; and <u>76</u> Reply Brief to Judge Callie V. S. Granade. (mab) (Entered: 11/03/2014)
12/12/2014	<u>78</u>	ORDER, DENYING <u>62</u> Motion for Summary Judgment filed by SafetyNet Youthcare, Inc.; GRANTING <u>63</u> Motion for Summary Judgment filed by Alabama Disabilities Advocacy Program; and DENYING <u>64</u> Motion for Summary Judgment filed by Alabama Department of Human Resources. ADAP and SafetyNet are required to meet and to develop a protocol consistent with this order for presentation to the Court no later than January 30, 2015. Declaratory judgment is entered against SafetyNet, and SafetyNet is permanently enjoined from denying ADAP reasonable access to its intensive and moderate programs at the Minter, Alabama facility. A separate judgment will be entered. The Court retains jurisdiction to enforce the injunction. Signed by Judge Callie V. S. Granade on 12/12/2014. (mab) (Entered: 12/12/2014)
12/15/2014	<u>79</u>	DECLARATORY JUDGMENT, entered in favor of Alabama Disabilities Advocacy Program, and against SafetyNet YouthCare, Inc. SafetyNet Youthcare, Inc. is PERMANENTLY ENJOINED from denying Alabama Disabilities Advocacy Program reasonable access to its intensive and moderate programs located at the Minter, Alabama facility. Signed by Judge Callie V. S. Granade on 12/15/2014. (mab) (Entered: 12/15/2014)
12/29/2014	<u>80</u>	MOTION to Reconsider Court's <u>78</u> Order Regarding Attorney's Fees and Costs, and MOTION Requesting Reasonable Attorney's Fees and Costs, filed by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Memorandum, # <u>2</u> Exhibit Exhibit A, # <u>3</u> Exhibit Exhibit B, # <u>4</u> Exhibit Exhibit C) (Mixson, Andrea). Added MOTION for Attorney Fees on 1/3/2015 (mab). (Entered: 12/29/2014)
12/30/2014	<u>81</u>	Order re: <u>80</u> MOTION for Attorney Fees filed by Alabama Disabilities Advocacy Program. Any party opposing the motion must file response by 1/13/2015. Replies due by 1/20/2015. Motion to be taken under submission on 1/21/2015. Signed by Judge Callie V. S. Granade on 12/30/2014. (tot) (Entered: 12/30/2014)
01/13/2015	<u>82</u>	RESPONSE in Opposition to ADAP's <u>80</u> MOTION to Reconsider Court's <u>78</u> Order Denying ADAP's Request for Attorneys' Fees and Costs, filed by SafetyNet YouthCare, Inc. (Thompson, Martha) (Entered: 01/13/2015)
01/13/2015	<u>83</u>	RESPONSE in Opposition to ADAP's <u>80</u> MOTION to Reconsider Court's <u>78</u> Order Regarding Attorney's Fees, filed by Alabama Department of Human Resources (DHR). (Brooks, Felicia) (Entered: 01/13/2015)
01/13/2015		REFERRAL OF <u>82</u> & <u>83</u> RESPONSES in Opposition to ADAP's <u>80</u> MOTION to Reconsider Court's <u>78</u> Order Denying ADAP's Request for Attorneys' Fees and Costs to Judge Granade. (mab) (Entered: 01/13/2015)
01/20/2015	<u>84</u>	REPLY Brief filed by Plaintiff Alabama Disabilities Advocacy Program re: <u>82</u> Response in Opposition to Motion filed by Alabama Disabilities Advocacy Program. (Attachments: # <u>1</u> Exhibit) (Mixson, Andrea) (Entered: 01/20/2015)
01/21/2015	<u>85</u>	MOTION for Leave to File <i>Sur-Reply to Correct Misstatements of Law & Fact</i> by SafetyNet YouthCare, Inc.. (Thompson, Martha) (Entered: 01/21/2015)

01/21/2015		MOTIONS REFERRED: <u>85</u> MOTION for Leave to File <i>Sur-Reply to Correct Misstatements of Law & Fact</i> Referred to Judge Callie V. S. Granade. (mab) (Entered: 01/21/2015)
01/22/2015	<u>86</u>	ENDORSED ORDER granting <u>85</u> Motion for Leave to File <i>Sur-Reply to Correct Misstatements of Law and Fact</i> . No further filings will be permitted. Signed by Judge Callie V. S. Granade on 1/22/2015. (tot) (Entered: 01/22/2015)
01/26/2015	<u>87</u>	<i>Sur-Reply in Opposition to ADAP's <u>80</u> Motion to Reconsider Court's Order Denying ADAP's Request for Attorneys' Fees</i> , filed by SafetyNet YouthCare, Inc. (Thompson, Martha) (Entered: 01/26/2015)
01/26/2015		REFERRAL OF <u>87</u> <i>Sur-Reply in Opposition to ADAP's <u>80</u> Motion to Reconsider Court's Order Denying ADAP's Request for Attorneys' Fees</i> to Judge Granade. (mab) (Entered: 01/26/2015)
01/30/2015	<u>88</u>	NOTICE by Alabama Disabilities Advocacy Program re <u>78</u> Order on Motion for Summary Judgment,,,,,,,,, <i>ADAP Access Procedures for SafetyNet Facilities</i> (Attachments: # <u>1</u> Exhibit Access Protocol) (Mixon, Andrea) (Entered: 01/30/2015)
02/11/2015	<u>89</u>	ORDER, GRANTING IN PART and DENYING IN PART, ADAP's <u>80</u> Motion for Reconsideration as set out in Order. Additionally, to ensure ongoing compliance to DHR and facilities situated similarly to SafetyNet, the Court ATTACHES to this Order EXHIBIT A. (Doc. 88, Exh. 1). Signed by Judge Callie V. S. Granade on 2/10/2015. (Attachment: # <u>1</u> Exhibit A - Access Protocol) (mab) (Entered: 02/11/2015)
02/18/2015	<u>90</u>	NOTICE by SafetyNet YouthCare, Inc. re <u>89</u> Order on Motion for Reconsideration, Order on Motion for Attorney Fees., (<i>Compliance</i>) (Thompson, Martha) (Entered: 02/18/2015)