

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
Western Division

ROSIE D., et al.,)	
)	
Plaintiffs)	
)	
v.)	Civil Action No.
)	01-30199-MAP
MITT ROMNEY, et al.,)	
)	
Defendants)	
)	

JOINT STIPULATION ON THE MONITOR

Pursuant to the Court’s February 22, 2007 Remedial Order, the parties submit this Joint Report and Stipulation on the Monitor.

1. The parties agree that Karen L. Snyder should be appointed by the Court as the Monitor in this case, with the authorities and responsibilities set forth in the Defendants’ Proposed Remedial Plan. A copy of Ms. Snyder’s *curriculum vitae* is attached as Exhibit 1.

2. Ms. Snyder will assume some of her responsibilities as the Monitor on June 9, 2007, and begin working up to full time as needed as the Monitor on July 1, 2007. 3.

The defendants will contract with Ms. Snyder as an independent consultant. The contract will include sufficient funding to operate the Office of the Monitor, as set forth in an annual budget approved by the Court.

4. The contract will represent the maximum obligation of the Commonwealth for the Office of the Monitor for that year. Ms. Snyder will have reasonable flexibility to expend the funds provided in the contract. The parties understand that Ms. Snyder may not expend all funds included in the contract, if she determines that either staff or expenses

allowed under the contract are not needed.

5. Ms. Snyder will be responsible for paying all of the expenses of the Office of the Monitor. She will be reimbursed for such expenses by the Commonwealth in the ordinary course, consistent with the terms of the contract and the submission of necessary vouchers and documentation to the Commonwealth.

6. Pursuant to the contract, Ms. Snyder may employ a program assistant up to full-time as needed and necessary consultants. The program assistant shall have qualifications and experience in children's mental health services.

7. The defendants will provide Ms. Snyder a business office in Massachusetts, including supplies, telephone, computers, and equipment, located in an existing program or entity that is not affiliated with this case. The defendants will also provide Ms. Snyder with a half-time administrative assistant, who is acceptable to Ms. Snyder, to be located at her Massachusetts office. The administrative assistant shall not be simultaneously employed for anyone affiliated with this case and shall ensure that all communications, documents, and information related to the Office of the Monitor are maintained in a confidential manner. Ms. Snyder also shall be reimbursed for her reasonable travel expenses for her time in Massachusetts.

8. The budget for the first year of the Office of the Monitor is attached as Exhibit 2. The parties agree that this budget is reasonable and should be approved by the Court.

Respectfully submitted,

Defendants,

By their attorney,

MARTHA COAKLEY
ATTORNEY GENERAL

_____/s/ Juliana deHaan Rice_____
Juliana deHaan Rice
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Plaintiffs,

By their attorneys,

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Dated: April 5, 2007

Certificate of Service

The undersigned counsel hereby certifies that this document is being filed through the ECF system and thus will be sent electronically to all registered participants.

_____/s/ Juliana deHaan Rice_____
Juliana deHaan Rice
Assistant Attorney General