

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

James and Lorie Jensen, as parents, guardians and next friends of Bradley J. Jensen, et. al,	Court File No.: 09-CV-1775 DWF/FLN
Plaintiffs,	MOTION FOR PRELIMINARY INJUNCTION
vs.	
Minnesota Department of Human Services, an agency of the State of Minnesota, et. al,	
Defendants.	

TO: DEFENDANTS ABOVE NAMED AND THEIR COUNSEL OF RECORD:

MOTION

Plaintiffs James and Lorie Jensen, as parents, guardians and next friends of Bradley J. Jensen; James Brinker and Darren Allen, as parents, guardians and next friends of Thomas M. Allbrink; Elizabeth Jacobs, as parent, guardian and next friend of Jason R. Jacobs; and others similarly situated through their respective undersigned counsel, move this Court pursuant the Federal Rules of Civil Procedure, this Court's Local Rules, and applicable law as follows:

1. For issuance of a Preliminary Injunction enjoining the use of seclusion and restraints of any kind under any circumstances at the Minnesota Extended Treatment Options program and any successor program; and
2. For such other and further relief as this Court deems just and equitable.

This Motion is based upon the Memorandum of Law and supporting documents and any arguments of counsel as permitted by the Court.

Respectfully submitted,

JOHNSON & CONDON, P.A.

s/ Shamus P. O'Meara

July 19, 2010
Dated: _____

Shamus P. O'Meara (#221454)
Mark R. Azman (#237061)
M. Annie Mullin (# 0389206)
7401 Metro Boulevard, Suite 600
Minneapolis, MN 55439-3034
(952) 831-6544

ATTORNEYS FOR PLAINTIFFS

842132.doc