



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 THE DISTRICT OF COLUMBIA, et al., )  
 )  
 Defendants. )

Civ. No. 95-948 TFH

UNITED STATES' MOTION FOR A PRELIMINARY INJUNCTION  
TO ENJOIN DANGEROUS AND LIFE-THREATENING PRACTICES  
AND TO ENSURE BASIC CARE, SERVICES AND TREATMENT

The United States moves this Court, pursuant to Fed. R. Civ. P. 65 and D.D.C. R. 205 (c) and (d), for a preliminary injunction to enjoin the dangerous and life-threatening practices and deficient medical and nursing care at the D.C. Village Nursing Home ("DCV"). The United States further requests that the Court grant equitable relief to ensure that Defendants take the necessary actions to provide basic care, services, and treatment consistent with professional standards to ensure the protection of the constitutional rights of the individuals who reside at DCV.

The specific injunctive relief requested is set forth in the accompanying proposed Order. The grounds supporting this Motion and proposed Order are fully set forth in the accompanying Memorandum.

The United States further moves this Court for an evidentiary hearing on this Motion, if such a hearing is deemed necessary, to obtain the relief sought.

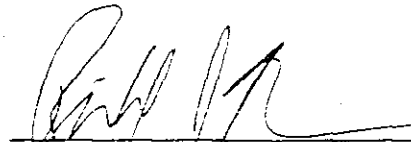
Respectfully submitted,

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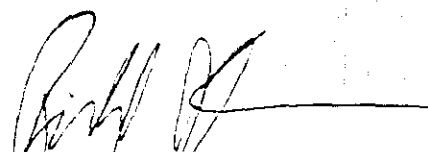
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BAR #248120  
BAR #424225

CERTIFICATE OF SERVICE

I certify that the foregoing United States' Motion for a Preliminary Injunction to Enjoin Dangerous and Life-Threatening Practices and to Ensure Basic Care, Services and Treatment, its accompanying Memorandum in support, and a proposed Order were served by messenger on this 19<sup>th</sup> day of June, 1995, upon the counsel of record:

Melvin W. Bolden, Jr.  
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