



PC-DC-008-020

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)
TWELVE JOHN DOES, <u>et al.</u> ,	)
	)
<u>Plaintiffs,</u>	)
	)
v.	)
	)
DISTRICT OF COLUMBIA, <u>et al.</u> ,	)
	)
<u>Defendants.</u>	)
_____	)

Civil Action No. 80-2136

**FILED**

**MAR 3 - 1982**

NOTIFICATION TO CLASS MEMBERS  
OF PROPOSED SETTLEMENT AGREEMENT

CLERK, U.S. DISTRICT COURT  
DISTRICT OF COLUMBIA

On August 20, 1980, a class action was filed on your behalf challenging the conditions of confinement at the Central Facility of the District of Columbia Reformatory at Lorton, Virginia. Filed in the United States District Court for the District of Columbia, the complaint named as defendants the District of Columbia and certain officials of the District of Columbia government. The caption of the case is set forth above.

This lawsuit sought three basic forms of relief: (1) an order requiring defendants to improve conditions of security and safety at the Central Facility (2) an order requiring defendants to refrain from activities that violate the constitutional rights of residents at the Central Facility and (3) an award of money damages to compensate each class member for harm caused by the unacceptable conditions of his confinement.

The Court determined on December 5, 1980 that the case would be maintained as a class action. The members of the class of plaintiffs are all persons who, on August 20, 1980,

were residents of the Central Facility of the District of Columbia Reformatory at Lorton, Virginia. Class representatives who presented the claims on behalf of you and all class members were residents of the Central Facility on August 20, 1980.

The defendants in this action are the District of Columbia Government; Marion S. Barry, Jr., Mayor of the District of Columbia; Delbert C. Jackson, Director of the Department of Corrections; Marion D. Strickland, Superintendent of the Lorton Complex; Salanda V. Whitfield, Administrator of the Central Facility; Arthur Graves, Assistant Administrator of the Central Facility; and David P. Decatur, Institutional Major of the Central Facility.

In pursuing plaintiffs' claims, counsel for plaintiffs conducted extensive discovery, compelling production of documents from all levels of the Department of Corrections, deposing individual defendants and other employees of the Department, interviewing approximately 20 other employees of the Department, meeting with more than 200 members of the class and other residents of the Central Facility not members of the class, filing interrogatories, and employing three experts in the areas of penology and prison security, health and sanitation, correctional psychology and correctional medical services. Each expert inspected the Central Facility and relevant documents. Each interviewed residents and employees of the Department at Central.

After full review of all relevant documentation and consultation with the experts, interviews with residents and review of cases relevant to the issues raised by plaintiffs' claims, counsel for plaintiffs has recommended the proposed

final settlement agreement, hereto attached, to the members of the class. This agreement would settle all of the claims for declarative and injunctive relief and damages described above.

NOW, THEREFORE, TAKE NOTICE:

1. If you were a resident of the Central Facility on August 20, 1980, you are a member of the class of plaintiffs described above and have been included in the class of persons for whom injunctive relief (an order of the Court as described above) has been sought. Unless you wrote to the Clerk of the United States District Court for the District of Columbia requesting to be excluded from the class on the claims for money damages, you also are a member of the class for purposes of damage claims.

2. If you are a member of the class and have any comments on the proposed final settlement agreement, you should mail a letter stating them to:

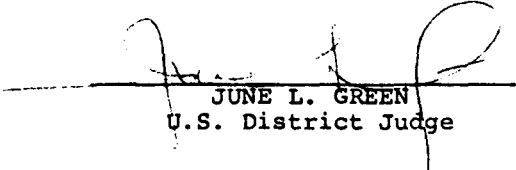
The Honorable June L. Green  
U.S. District Judge  
U.S. District Court for the  
District of Columbia  
Constitution Avenue and  
John Marshall Place, N.W.  
Washington, D.C. 20001

ATTN: Twelve John Does v. District of Columbia  
Civil Action No. 80-2136

This request must be mailed on or before March 31, 1982.

NOTE: Be sure to write the name of the case and the trial action number on all letters mailed to this Court.

Dated this 3<sup>rd</sup> day of March, 1982.

  
\_\_\_\_\_  
JUNE L. GREEN  
U.S. District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of March, 1982, I have caused to be served by delivering to the United States Postal Service, postage prepaid, true and accurate copies of Plaintiffs' and Defendants' Order for Class Notification of Proposed Settlement Agreement, addressed to the following person:

Michael Zielinski, Esq.  
Assistant Corporation Counsel  
The District Building  
14th & E Streets, N.W.  
Suite 329  
Washington, D.C. 20004

*Michael S. Bernstein*  
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MICHAEL S. BERNSTEIN