

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

HENRY DAVIS, <i>et al.</i> ,)	
Plaintiffs,)	
)	
)	
vs.)	Case No. 3:16-cv-600-MAB
)	
ROB JEFFREYS,)	Judge Mark A. Beatty
Defendant.)	

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs Henry Davis, Douglas Coleman, Aaron Fillmore, Jerome Jones, DeShawn Gardner, and Percell Dansberry hereby move for an order certifying the following class pursuant to Federal Rule of Civil Procedure 23:

All prisoners who are now or will be incarcerated in adult correctional facilities by the Illinois Department of Corrections and thus who are at risk of being subjected to extreme isolation or who are currently subjected to extreme isolation.

This motion is based on upon this Motion for Class Certification, the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Class Certification and all of its attached declarations and exhibits, the pleadings and papers on file in this action, oral argument, and any such other matters as the Court may consider in hearing this motion.

Dated: September 6, 2019

Respectfully submitted,

By: /s/ Kimball R. Anderson

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CERTIFICATE OF SERVICE

The undersigned counsel for Plaintiffs hereby certifies that on this 6th day of September, 2019, he caused a copy of the foregoing PLAINTIFFS' MOTION FOR CLASS CERTIFICATION to be served by CM/ECF to all parties and counsel of record.

Dated: September 6, 2019

By: /s/ Kimball R. Anderson
Attorney for Plaintiffs

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