

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT COURT OF INDIANA
TERRE HAUTE DIVISION**

AARON ISBY-ISRAEL,)
)
 Plaintiff,)
)
 vs.) Cause No. 2:12-cv-116-JMS-MJD
)
 JAMES WYNN, et al.,)
)
 Defendants.)

**SUBMISSION OF PROPOSED PLAN FOR
REMOVAL FROM RESTRICTIVE STATUS HOUSING**

Defendant Jack Hendrix, Executive Director of Classification, in his official capacity, submits the following plan for removal of the plaintiff from department-wide or facility restrictive status housing as directed by the court at docket no. 274, p. 33.

1. Within two weeks of acceptance of this proposed plan (precise dates of offender movement are not disclosed for security reasons), plaintiff Aaron Isby, DOC # 892219, will be transferred to O housing unit at the New Castle Correctional Facility. This is a general population unit that offers programs for offenders. There will be ten days of initial admission processing and orientation.

2. The STAND Program (Striving Toward a New Direction) is designed in phases, each lasting approximately 90 days, with a Treatment Team review after each phase. Plaintiff would be admitted to that program, a step-down program for those leaving restrictive status housing.

3. The offender handbook is attached for reference. The court also heard testimony about the program during these proceedings. The actual program materials are now in counsel's possession in scanned form but are not being filed in the absence of a request from the court as they comprise 324MB of files totaling approximately 1,296 pages by counsel's quick review and count.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on January 4, 2019, a copy of the foregoing *Response* was filed electronically using the Court's CM/ECF system, sending notice to the following counsel of record who may access this filing using the Court's system:

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