

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

MARY ANN MCBRIDE; BRIAN
STANLEY WITTMAN; & RALPH
WILLIAMS, on behalf of themselves &
all others similarly situated,

Plaintiffs,

v

MICHIGAN DEPARTMENT OF
CORRECTIONS; DANIEL H. HEYNS,
in his official capacity as Director of the
Michigan Department of Corrections;
THOMAS FINCO, in his official capacity
as Deputy Director of the Correctional
Facilities Administration; RANDALL
TREACHER, in his official capacity as
Chief Deputy Director of the Michigan
Department of Corrections; ANTHONY
STEWART, in his official capacity as
Warden of the Women's Huron Valley
Correctional Facility; JEFFREY
WOODS, in his official capacity as
Warden of the Chippewa Correctional
Facility; & CATHLEEN STODDARD, in
her official capacity as Warden of the
Carson City Correctional Facility,

Defendants.

v

EDWARD BURLEY #502426 &
BRANDON RESCH #304507,

Interested Parties.

Abraham Singer (P23601)
Law Offices of Abraham Singer
30833 Northwestern Hwy. Ste. 120

Scott A. Mertens (P60069)
Assistant Attorney General
Attorney for Defendants Michigan

Farmington Hills, MI 48334
(248) 626-8888
asinger@singerpllc.com

Andrew D. Lazerow
Stephen C. Bartenstein
Brian E. Kempfer
Covington & Burling LLP
850 Tenth Street NW
Washington, DC 20001
(202) 662-6000
alazerow@cov.com

Chris E. Davis (P52159)
Michigan Protection & Advocacy
Service
4095 Legacy Parkway, Ste 500
Lansing, MI 48911
(517) 487-1755
cdavis@mpas.org

Attorneys for Plaintiffs

Dep't of Corrections; Daniel H.
Heyns, Thomas Finco, Randall
Treachner, Anthony Stewart,
Jeffrey Woods & Cathleen
Stoddard
Michigan Dep't of Attorney
General
MDOC Division
P.O. Box 30217
Lansing, MI 48909
(517) 335-3055
MertensS@michigan.gov

Attorneys for Defendants

STIPULATED ORDER ON SETTLEMENT COMPLIANCE

The parties hereby stipulate and agree to the following deadlines for implementation of certain terms of the Settlement Agreement (ECF No. 112):

1. The Michigan Department of Corrections (MDOC) shall enact a statewide policy that implements the terms of the Settlement Agreement by **March 1, 2020**, on which date MDOC will verify its compliance in writing to the Settlement Monitor.

2. MDOC shall complete training of all its ADA Coordinators on the requirements of the Settlement Agreement by **March 1, 2020**, on which date MDOC will verify its compliance in writing to the Settlement Monitor.
3. MDOC shall give Plaintiffs' Counsel and the Settlement Monitor weekly updates starting on **March 1, 2020** and continuing until MDOC verifies in writing to the Settlement Monitor that it has implemented all local operating procedures necessary to implement the terms of the Settlement Agreement. MDOC shall ensure that it has implemented all local operating procedures no later than **September 30, 2020**.
4. MDOC shall complete training of all of its Personnel at Designated Facilities pursuant to Section XIV of the Settlement Agreement by **June 1, 2020**, on which date MDOC will verify its compliance in writing to the Settlement Monitor and will provide records showing the completion of the training of such Personnel to the Settlement Monitor.
5. MDOC shall complete training of all of its Personnel at all facilities that house deaf and hard of hearing pursuant to Section XIV of the Settlement Agreement by **September 30, 2020**, on

which date MDOC will verify its compliance in writing to the Settlement Monitor and will provide records showing the completion of the training of such Personnel to the Settlement Monitor.

IT SO ORDERED.

THIS 3rd DAY OF MARCH 2020

s/Sean F. Cox
Sean F. Cox
United States District Judge

s/David R. Grand
David R. Grand
United States Magistrate Judge

The parties, through their respective counsel, stipulate to the entry of the above order.

Date: February 26, 2020

Date: February 26, 2020

/s/ Scott A. Mertens
Scott A. Mertens (P60069)
Attorney for Defendants Michigan
Dep't of Corrections, Daniel H.
Heyns, Thomas Finco, Randall
Treacher, Anthony Stewart, Jeffrey
Woods & Cathleen Stoddard
MDOC Division
P.O. Box 30217
Lansing, MI 48909
(517) 335-3055
MertensS@michigan.gov

/s/Andrew D. Lazerow w/permission
Andrew D. Lazerow
Stephen C. Bartenstein
Brian E. Kempfer
Covington & Burling LLP
One CityCenter, 850 Tenth St, NW
Washington, DC 20001
(202) 662-6000
alazerow@cov.com
sbartenstein@cov.com
bkempfer@cov.com

Counsel for Defendants

Counsel for Plaintiffs