

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
HATTIESBURG DIVISION

MISSISSIPPI DISTRICT COURT

Plaintiff,

Case No. 2:11cv53-KS-MTP

FORREST COUNTY, MISSISSIPPI,

Defendant.

For the reasons stated above and in Plaintiff's Memorandum, Plaintiff respectfully requests that this Court enter a preliminary injunction, requiring the Defendant, its agents, employees, and all other persons acting in concert with the Defendant to allow DRMS to enforce its rights by:

1. Allowing DRMS and/or its agents to conduct confidential visits with any of the residents to determine if a resident is eligible for DRMS's services.
2. Allowing DRMS and/or its agents to conduct confidential visits with any eligible resident who would like to speak with DRMS or its agents.
3. Allowing DRMS and/or its agents to conduct confidential interviews with any

instance of abuse, neglect, or other maltreatment of any resident eligible for DRMS's services.

6. Allowing DRMS and/or its agents reasonable unaccompanied access to view and

In support of this motion, Plaintiff relies on the following exhibits:

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