



*Brown v. Plata*

**I. STATEMENT OF FACTS**

**A. Defendants' Policies and Practices Expose Class Members to an**

*Id.*

2. *Defendants' Policies Regarding Access to Primary Care Expose Class Members to an Unreasonable Risk of Serious Harm*

*Id.*

*Id.*

*Id.*

*Id.*

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<sup>1</sup> *See, e.g.*

3. *Defendants' Policies Regarding Access to Specialty Care and Outside Facilities Expose Class Members to an Unreasonable Risk of Serious Harm*



*Id.*

*Id.*

*see also*

**B. These Deficient Policies and Practices Have Exacerbated Medical 'dical' s.Uytingpre**

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*Id.*

*more*

*fewer*

*Id.*

*avoid*

*See, e.g.*

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**D. Defendants Discriminate Against Inmates with Disabilities**

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*Id.*





*Diamond*

*see also, e.g. In re Rodriguez*

*See, e.g. Dunn*

*Williams*

*Dockery*





*See, e.g. Lightbourn v. Cnty. of El Paso*

*see also*                      *supra*



*Comput. Corp.*

*all*

**B. Plaintiffs' Claims Satisfy Rule 23(b)(2)**

*M.D.*

*see also, e.g. Dockery*

*Hernandez*



**C. Plaintiffs' Counsel Should Be Appointed as Class Counsel Under Rule 23(g)**

*See*

*See*

*Ball v. LeBlanc*

**IV. CONCLUSION**

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*pro hac vice*  
*pro hac vice)*

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**CERTIFICATE OF SERVICE**

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