

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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JANE DOE, individually and on behalf of all))	
others similarly situated,))	
))	
Plaintiff,))	Civil Action No. 1:14-cv-12813
))	
v.))	
))	
Deval L. Patrick, Governor of the))	
Commonwealth of Massachusetts;))	
Massachusetts Department of Correction; Luis))	Oral Argument Requested
S. Spencer, Commissioner of the Massachusetts))	
Department of Correction; and Lynn))	
Bissonnette, Superintendent of the))	
Massachusetts Correctional Institution at))	
Framingham,))	
))	
Defendants.))	
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PLAINTIFF’S MOTION FOR CLASS CERTIFICATION

Plaintiff Jane Doe, on behalf of herself and all others similarly situated, moves for class certification under Federal Rules of Civil Procedure 23(a) and 23(b)(2). The proposed class consists of:

All women who are now or will be imprisoned at MCI-Framingham based solely on a civil commitment under Massachusetts General Laws Chapter 123, Section 35.

In support of the Motion, Plaintiff relies on the accompanying Memorandum of Law and attached exhibits.

Plaintiff further moves for the appointment of the undersigned counsel as class counsel pursuant to Federal Rule of Civil Procedure 23(g).

In the alternative, if the Court finds Plaintiff has not established the requirements for certification, Plaintiff requests class discovery.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Counsel respectfully asks the Court for a hearing on this motion.

CERTIFICATION WITH RESPECT TO LOCAL RULE 7.1(A)(2)

Because Defendants' counsel have not yet been served with the complaint, and have thus not appeared, counsel have not been able to meet and confer regarding this motion. Plaintiff's counsel will meet and confer with Defendants' counsel regarding this motion upon their appearance.

Dated: June 30, 2014

Respectfully submitted,

/s/ William F. Lee

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Attorneys for Plaintiff Jane Doe

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon each party below by mail on June 30, 2014.

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