

Plaintiffs further move 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 Plaintiffs have not established the requirements for certification, Plaintiffs request class discovery.

REQUEST FOR ORAL ARGUMENT

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

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), I hereby certify that counsel for Plaintiffs conferred with counsel for Defendants on the subject of this motion. Counsel for Defendants indicated that they oppose Plaintiffs' Motion.

Respectfully submitted,

Plaintiffs Leonard Briggs, George Skinder,
Rolando S. Jimenez, Louis Markham, Eric
Roldan, Francis McGowan, and Jennifer
Ward,

By their attorneys,

Dated: March 4, 2016

/s/ Tatum A. Pritchard (with consent)

Tatum A. Pritchard, BBO #664502

Elizabeth Matos, BBO #671505

PRISONERS' LEGAL SERVICES

10 Winthrop Square, 3rd Floor

Boston, MA 02110

(617) 482-2773

tpritchard@plsma.org

lmatos@plsma.org

/s/ Lisa J. Pirozzolo

Lisa J. Pirozzolo, BBO# 561922

Alathea E. Porter, BBO#661100

Alexandra B. Bonneau, BBO #687785

WILMER CUTLER PICKERING

HALE AND DORR, LLP
60 State Street
Boston, MA 02109
(617) 526-6000
lisa.pirozzolo@wilmerhale.com
alatheia.porter@wilmerhale.com
alexandra.bonneau@wilmerhale.com

/s/ Deborah Golden (with consent)
Deborah Golden (*pro hac vice*)
WASHINGTON LAWYERS'
COMMITTEE FOR CIVIL RIGHTS &
URBAN AFFAIRS
11 DuPont Circle, NW Suite 400
Washington, DC 20036
(202) 319-1000

CERTIFICATE OF SERVICE

I hereby certify that this motion and its attachments filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 4, 2016.

/s/ Lisa J. Pirozzolo
Lisa J. Pirozzolo