

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

KEITH MATHIS, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	Case No. 1:07-cv-01155-RMU
	)	
GEO GROUP INC., <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	
	)	

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs, by counsel, hereby respectfully move the Court for an order certifying this action as a class action pursuant to Rule 23 of the Federal Rules of Civil Procedure, on behalf of (1) a class of former, current and future prisoners in the custody of the Federal Bureau of Prisons ("BOP"), and incarcerated at the Rivers Correctional Institution ("Rivers"), who, during their incarceration at Rivers, depend on the organizations, systems, policies, and practices of Defendants for their receipt of medical, dental, and mental health care, and (2) a sub-class of former, current, and future disabled prisoners in the custody of the BOP and incarcerated at Rivers, who have been denied access to programs, services, facilities, and activities at Rivers as a consequence of Defendants' failures to adequately diagnose, monitor, treat and/or accommodate their disabilities.

As discussed in the accompanying memorandum, this action meets the requirements for class certification under Rules 23(a) and 23(b) of the Federal Rules of Civil Procedure, and the interests of justice would best be served by adjudication of the proposed class members' claims in a single action.

Respectfully submitted,

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Counsel for Plaintiffs

September 25, 2007

LOCAL RULE 7(m) STATEMENT

Counsel for Plaintiffs attempted to contact counsel for Defendants seeking their position on this matter, but had not receive a response by the time this motion was filed.

Respectfully submitted,

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