

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MICHAEL GRAHAM; ALEXUS DIGGS; and
HEATHER CONNOLLY, *on behalf of
themselves and all others similarly situated,*

Plaintiffs-Petitioners,

v.

ALLEGHENY COUNTY; and ORLANDO
HARPER, *Warden of Allegheny County Jail,*
Defendants-Respondents.

Civil Action No. 2:20-cv-00496

ELECTRONICALLY FILED

IMMEDIATE RELIEF SOUGHT

JOINT MOTION FOR ENTRY OF CONSENT ORDER

The parties respectfully request that this Honorable Court enter the parties' Proposed Consent Order, attached as Exhibit 1, and as support therefor aver as follows:

1. Plaintiffs filed a motion for preliminary injunction on April 9, 2020, asking this Court to, *inter alia*, require that Defendants instituting policies and reasonable accommodations, consistent with the CDC's public health guidelines to protect people incarcerated at the Allegheny County Jail from COVID-19.
2. After numerous discussions, the parties have reached an agreement on the policies and reasonable accommodations that the Allegheny County Jail will follow to protect people from COVID-19.
3. Accordingly, the parties are jointly submitting a proposed consent order that, if approved by the Court, will resolve the plaintiffs' motion for preliminary injunction.

WHEREFORE, the parties respectfully request that this Court enter the Proposed Consent Order attached as Exhibit 1.

Respectfully submitted,

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