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2009 MAY 22 AM 10:41

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CENTRAL DIST. OF CALIF.
LOS ANGELES

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

Disability Rights California, California
Protection and Advocacy Agency For
Persons With Disabilities,

Plaintiff,

v.

Sierra Vista Rehabilitation Center,
SunBridge Healthcare Corporation

Defendants

CASE NO.: CV09-3664

PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION

Dept: Spring Street, 9

Judge: Fairbank

Hearing Date and Time: June 22, 2009

Action Filed: 1:30 PM

VBF

(FFMx)

1 Pursuant to Rule 65 of the Federal Rules of Civil Procedure and Local Rule
2 65-1, Plaintiff by and through its counsel applies to this Honorable Court to
3 preliminarily enjoin defendants Sierra Vista Rehabilitation Center and SunBridge
4 Healthcare Corporation from denying or interfering with full, complete, and
5 meaningful access of Disability Rights California to records, facilities and
6 residents as mandated by the Developmental Disabilities Assistance and Bill of
7 Rights Act, 42 U.S.C. § 15041, *et seq.*, and the regulations promulgated thereto,
8 the Protection and Advocacy for Individuals with Mental Illness Act, 42 U.S.C.
9 § 10801, *et seq.*, and regulations promulgated thereto, and Sections 4900 *et seq.*
10 of the California Welfare and Institutions Code.
11

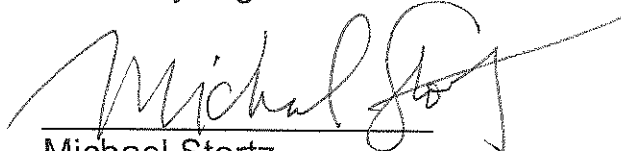
12 This motion is based on the pleadings filed herein, the Complaint for
13 Declaratory and Injunctive Relief, Memorandum of Points and Authorities in
14 Support of Plaintiff's Motion for Preliminary Injunction, Declarations in Support of
15 Plaintiff's Motion for Preliminary Injunction, and Proposed Order.
16

17 Plaintiff agrees to meet and confer with counsel for the Defendants on a
18 hearing date and briefing schedule.
19

20 Dated: May 21, 2009

Respectfully Submitted,

Disability Rights California

25 

26 Michael Stortz
27 Attorneys for Plaintiff
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