

ALABAMA DISABILITIES ADVOCACY
PROGRAM

Plaintiff,

v.

J. WALTER WOOD, JR. in his official
Capacity as Executive Director of the
Alabama Department of Youth Services,

Defendant.

V.

J. WALTER WOOD, JR. in his official)
Capacity as Executive Director of the)
Alabama Department of Youth Services,)
)
Defendant.)

1. Plaintiff, Alabama Disabilities Advocacy Program (“ADAP”), moves for Summary Judgment against J. Walter Wood, Jr., in his official capacity as Executive Director of Alabama Department of Youth Services (“DYS”). Grounds supporting this motion are as follows.

- 1

any state confidentiality laws or attorney work-product privileges asserted by the Defendant.

- c. Plaintiff files simultaneously a separate memorandum of law in support of, and hereby incorporates that memorandum as part of, this motion.

WHEREFORE, Plaintiff respectfully requests that this Court grant Plaintiff's Motion for Summary Judgment.

Respectfully Submitted,

/s/ James A. Tucker

James A. Tucker

Alabama Disabilities Advocacy Program

University of Alabama

Box 870395

Tuscaloosa, AL 35487

(205) 348-4928 (Phone)

(205) 349-3909 (Facsimile)

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notice of such filing to the following attorneys of record for the defendants:

Mr. Dudley Perry Jr.
General Counsel
Alabama Department of Youth Services
PO Box 66
Mount Meigs , AL 36057-0066

/s/ James A. Tucker
James A. Tucker