

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ARISTOTLE P., CHIUCHIU G.,)
AUGUSTINE N., YAHARIA R.,)
MICHAEL W., REGINALD R., and)
GWENDOLYN B., individually)
and on behalf of all other)
similarly situated individuals)
by their next friend,)
PATRICK T. MURPHY, Public)
Guardian of Cook County,)

Plaintiffs,)

v.)

STERLING M. RYDER, Director,)
Illinois Department of)
Children and Family Services,)

Defendant.)

No. 88 C 7919

Judge Ann C. Williams

CONSENT DECREE

Plaintiffs filed this action on their own behalf and on behalf of all others similarly situated on September 15, 1988, against the Illinois Department of Children and Family Services ("DCFS" or the "Department"). Plaintiffs seek declaratory and injunctive relief regarding alleged policies and practices of DCFS under which, in the plaintiffs' view, they have been wrongfully placed apart from their siblings in substitute care and they have not been permitted to visit their siblings on a regular and reasonable basis. Plaintiffs'

Complaint alleged that DCFS's failure to place siblings together and to provide regular visitation violates plaintiffs' rights under the First and Fourteenth Amendments of the United States Constitution and 42 U.S.C. §§ 670-76.

Plaintiffs in this action are a class of children, certified by this Court's order dated October 3, 1989, who, on or after the date of the commencement of this action, are in the custody or guardianship of DCFS and (i) have not been placed with their siblings in foster homes or residential facilities, or (ii) have been denied regular and reasonable visitation with their siblings. Plaintiffs named Gordon Johnson, former Director of DCFS, for whom current Director of DCFS Sterling M. Ryder has been substituted, and Gary T. Morgan, Guardianship Administrator of DCFS, as defendants. Defendants were sued in their official capacity.

Defendants moved to dismiss plaintiffs' Complaint in its entirety. In a memorandum opinion and order dated September 6, 1989, this Court denied defendants' motion to dismiss plaintiffs' claims under the First and Fourteenth Amendments and granted defendants' motion to dismiss plaintiffs' statutory

claims. Aristotle P. v. Johnson, 721 F. Supp. 1002 (N.D. Ill. 1989) (Williams, J.).

Upon a motion by defendants, the Court certified the September 6, 1989, order for an immediate interlocutory appeal under 28 U.S.C. § 1292(b). The Seventh Circuit Court of Appeals denied defendants' request for an interlocutory appeal, and the case was returned to this Court for a hearing on plaintiffs' motion for a preliminary injunction. Plaintiffs' motion was referred to Magistrate Judge Weisberg for a hearing. Following initial discovery, further proceedings were stayed pending settlement negotiations between the parties. As set forth in this Consent Decree, the parties have agreed that Gary T. Morgan be voluntarily dismissed from this action.

Defendant Ryder denies all of the allegations of plaintiffs' Complaint, particularly all legal contentions that any alleged policies or practices have violated any state or federal law.

In an effort to avoid the burden, costs, and inherent risks of further litigation, plaintiffs and defendant have determined that it is in the interests of the class and the public to settle this action with the entry of this Consent Decree.

Having carefully reviewed this Consent Decree, the parties being in agreement hereto, and the Court fully advised on the premises, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

DEFINITIONS

1. As used herein, the following terms have the following meanings:

(a) "Administrative Case Review" or "ACR" means case reviews required by 42 U.S.C. § 675(5) and Ill. Rev. Stat. ch. 23 ¶ 5006a.

(b) "Case plan" or "service plan" means the plan required by 42 U.S.C. § 675(1), Ill. Rev. Stat. ch. 23, ¶ 2058.2, and 89 Ill. Adm. Code § 305.

(c) "Child," "children," "class members," or "DCFS clients," unless otherwise indicated by the context, all mean members of the class certified by this Court's order dated October 3, 1989, and defined in Paragraph 3 of this Consent Decree.

(d) "Department of Children and Family Services" or "DCFS" or "Department" or "defendant" means the defendant Director of DCFS in his official capacity and his agents and includes all successor Directors of DCFS and their agents. The parties have agreed and this Court

hereby orders that defendant Gary T. Morgan is voluntarily dismissed from this action.

(e) "Parent" means the biological or adoptive parent of a child or, unless otherwise specified, the legal guardian or custodian of a child other than DCFS. "Parent" does not include foster parents or, with the exception of the reference in subparagraph (i) below, persons whose parental rights have been terminated.

(f) "Region" means Cook County or any of the downstate DCFS regions.

(g) "Residential Facility" means all non-foster care placements.

(h) "Short-term diagnostic placement" means a placement described in paragraph 37(b) of the Consent Decree entered in the lawsuit captioned B.H., et al., v. Suter, No. 88 C 5599 (N.D. Ill. Dec. 20, 1991), a copy of which is attached hereto as Appendix A. The excerpt from the B.H. Consent Decree is attached hereto solely for purposes of incorporating the description therein of a "short-term diagnostic placement" and shall not be construed as altering in any way the enforceability of the B.H. Decree as stated therein or under existing law. Nothing in this Consent Decree shall be construed as an

endorsement of the B.H. Consent Decree, in whole or in part, by plaintiffs' counsel.

(i) "Siblings," unless otherwise specified, means children in the custody or guardianship of DCFS who have a shared biological or adoptive parent.

DISCLAIMER

2. The provisions set forth in this Consent Decree are solely for the purpose of settlement of this action, and by agreeing to this Consent Decree neither party makes any express or implied admission of fact or law for any purpose.

CLASS CERTIFICATION

3. As set forth in this Court's order dated October 3, 1989, the plaintiff class certified in this case is defined as follows:

[c]hildren who are or will be the subject of neglect, dependency or abuse petitions filed in the State of Illinois; who are or will be in the custody or under the guardianship of the Department of Children and Family Services by order of court; who have not been or will not be placed with their siblings in foster homes or residential facilities; and who have been or will be denied regular and reasonable visitation with their siblings.

POLICIES REGARDING PLACEMENT OF SIBLINGS

4. By no later than 180 days from the entry of this Decree, DCFS shall adopt written rules providing that siblings shall all be placed together unless:

(a) it is in the best interests of one or more of the children to be placed or to remain placed apart from his or her siblings, as defined in subparagraph (a) of Paragraph 5;

(b) DCFS has been unable to locate a joint placement for the siblings, despite a diligent search by DCFS as defined in subparagraph (b) of Paragraph 5;

(c) a court has ordered that the siblings be placed apart; or

(d) it is in the best interests of the child or his or her sibling(s) to be placed with a relative.

5. By no later than 180 days from entry of this Decree, DCFS shall adopt written rules, procedures, protocols, or policy guides, as appropriate, to achieve the following policies:

(a) It shall be in the best interests of a child to be placed apart from his or her siblings only if:

(i) the child has been placed in a short-term diagnostic placement in order to determine the placement

needs of the child, or the child has special medical, educational, behavioral, or emotional needs which require the child to be placed apart from his or her siblings and the child has been placed or accepted at a placement intended to address those needs;

(ii) the child is at risk of physical, mental, or emotional harm if placed with his or her siblings and that specific risk and the basis for assessing that risk are documented in the child's case file;

(iii) placement of the child with his or her siblings would require that the child be removed from a foster home, and it is in the best interests of the child to remain in that foster home rather than move to a joint placement with his or her siblings; or

(iv) it is necessary to place the child apart from his or her siblings in order to achieve permanency for the child.

(b) A diligent search to locate a joint placement for siblings as required by subparagraph (b) of Paragraph 4 shall consist of written documentation that (1) DCFS has asked of the siblings' parents and known relatives whether there are any relatives who may be willing to become relative foster parents for the siblings; (2) DCFS has asked any current foster parents of a

child already in DCFS custody or guardianship whether they can accommodate the child's siblings; and (3) DCFS has conducted a search of vacant Department and private agency foster care placements and other appropriate placements in the same region as the parent's home to identify those placements that can provide a joint placement for the sibling group and that meet the placement requirements for all DCFS cases set forth in 89 Ill. Adm. Code § 302.390.

(i) DCFS shall conduct a diligent search (1) not later than 30 days after DCFS assumes custody of a sibling group or of any child with a sibling; and (2) when DCFS changes the placement of any child with a sibling unless it is not in the best interests, as defined in this Paragraph, of the child or sibling to be placed together. Nothing in this section shall preclude removal of a child when necessary due to an emergency.

(c) If an entire sibling group is not placed together, DCFS shall place as many siblings of the group together as possible, considering their relationship and the best interests of the children.

(d) If DCFS determines it is not in the best interests of the child to be placed with his or her siblings, DCFS shall identify in the child's case plan the

reasons why the siblings were placed apart. If siblings have been placed apart pursuant to subparagraph (b) of Paragraph 4, DCFS shall document in the case file the efforts made to place siblings together.

(e) If an entire sibling group cannot be placed together, DCFS shall make reasonable efforts to place siblings within reasonable proximity to one another taking into account the placement requirements for all DCFS cases as set forth in 89 Ill. Adm. Code § 302.390. DCFS may place a child at greater distance from his or her siblings if his or her treatment needs require placement farther away.

(f) If DCFS places siblings apart or after a change in placement, siblings remain placed apart, the efforts made to place siblings together and/or the reasons why the siblings were or remain placed apart shall be specifically reviewed at the first administrative case review following such placement to ensure compliance with the terms of this Consent Decree.

6. Within one year after the date DCFS promulgates rules, procedures, protocols, or policy guides under Paragraph 5 of this Decree, DCFS shall review the placements of all siblings in custody as of the date of promulgation of the rules, procedures, protocols, or policy

guides, who are not placed together to ensure that their placements meet the requirements of Paragraphs 4 and 5 of this Consent Decree.

7. By no later than 180 days from the date of the entry of this Decree, DCFS shall adopt procedures, policies or protocols requiring it to consider sibling relationships, among other factors, in developing and implementing permanency plans for children. Administrative case review staff shall review DCFS's compliance with such procedures, policies or protocols when reviewing permanency planning generally.

8. Within 60 days of the entry of this Decree, DCFS shall provide plaintiffs' counsel with an initial plan setting forth the actions DCFS will take to increase the number of foster homes and other placements capable of accommodating sibling groups. The plan shall include descriptions of specific programs, including pilot projects, to be implemented by DCFS.

9. Subsequent annual plans shall be provided to plaintiffs' counsel by March 31, 199⁵~~4~~, and by March 31 of each year thereafter for the term of this decree describing the actions the Department will undertake during the next fiscal year to increase the number of placements capable of accommodating sibling groups.

10. By no later than 90 days from the date of the entry of this Decree, the Department shall:

(a) publish proposed rules and procedures to allow for the waiver of appropriate standards for foster home licensing and relative foster home approval in cases in which such waivers would facilitate the joint placement of siblings while ensuring the safety and well-being of the children placed there; and

(b) review and, as appropriate, amend other rules and procedures which unduly inhibit the joint placement of siblings.

CONTACT AMONG SIBLINGS PLACED APART

11. By no later than 180 days from the entry of this Decree, DCFS shall adopt rules, procedures, or policy guides, as appropriate, for implementing the following policies:

(a) Subject to subparagraphs (c) and (d) of this Paragraph, at the time DCFS places siblings apart from one another in foster care or other substitute care setting, DCFS shall provide the child (seven years old and older) and the foster parent or other caretaker with each sibling's birth date and the name, address, and telephone number of the foster parent or other caretaker of each sibling placed by DCFS in substitute care. DCFS

shall also provide them such information regarding siblings in the custody of a parent if that information is or becomes known to DCFS.

(b) Subject to subparagraphs (c) and (d) of this Paragraph, whenever a child is moved to another placement, DCFS shall give written notice of the name, address, and telephone number of the child's new foster parent or other caretaker to each sibling and the foster parent or other caretaker of each sibling in writing within seven days of the move.

(c) If DCFS determines that it is not in a child's best interests to be provided information on a sibling's whereabouts or to have information on his or her whereabouts provided to his or her siblings, DCFS shall notify each child's attorney and guardian ad litem in writing within seven days of that determination. DCFS shall also record the reasons for that determination in the children's case file(s).

(d) Notwithstanding subparagraphs (a) and (b) of this Paragraph, the Department shall not be required to disclose to a child the name, address, and telephone number of a sibling's foster parent or other placement if a court has ordered that the sibling's whereabouts not be revealed to the child.

(e) Subject to the provisions of subparagraphs (c) and (d) above, DCFS shall permit and shall encourage foster parents and caretakers to assist children to write and phone their siblings as often as the children wish, provided, however, that, if necessary, a plan for scheduling reasonable phone calls may be established by the children's caseworker, together with the foster parent and the children. This plan shall be incorporated in the children's service plans. The Department shall also facilitate the use of mail for siblings' contact with each other, including payment of postage.

(f) The Department shall neither restrict nor seek to have any court restrict contact between siblings as a form of discipline under any circumstances.

12. Subject to subparagraphs (c) and (d) of Paragraph 11, within 180 days of the entry of this Decree, DCFS shall provide every member of a sibling group in its custody and the foster parent or other caretaker written notice of each other sibling's birth date and the name, address, and telephone number of the foster parent or other caretaker of each sibling placed by DCFS in a different substitute care setting. DCFS shall also provide the same information regarding siblings in the

custody of a parent if that information is or becomes known to DCFS.

VISITATION AMONG SIBLINGS PLACED APART

13. By no later than 180 days from the entry of this Decree, DCFS shall adopt written rules to achieve the following policies:

(a) Subject to the provision of subparagraph (b), the Department shall schedule and provide visits among all siblings placed apart at least twice per month, beginning no later than two weeks after DCFS assumes temporary custody of a sibling, unless:

(i) a court has ordered that sibling visits occur less frequently or not at all;

(ii) the child has stated that he or she does not want to visit with his or her sibling(s) or wants to visit less frequently and has been counseled by DCFS on the importance of maintaining family ties. If such a child is age 16 or under, the Department shall inquire of the child at least quarterly whether he or she wants to resume or increase the frequency of visits; or

(iii) one sibling may physically, mentally, or emotionally harm another during the visit, and supervision would be inadequate to eliminate the risk of such harm as determined by prior observation or documentation

of their interaction as recorded in the child's case file.

(b) In addition to the provisions set forth in subparagraph (a), if a sibling is placed in a residential facility, visitation with that child may occur less frequently than twice per month if:

(i) the child is at risk of physical harm if he or she visits with his or her siblings and that harm is specifically documented in the child's case file;

(ii) the child is at risk of mental or emotional harm if he or she visits with his or her siblings as determined by a qualified mental health professional; or

(iii) the child is placed in a residential facility that is located more than 150 miles from his or her siblings, provided, however, that in such event DCFS shall provide the child a visit with his/her other siblings, preferably overnight, at least every other month.

14. By no later than 180 days from the entry of this Decree, DCFS shall adopt written rules, procedures, protocols, or policy guides, as appropriate, to achieve the following policies:

(a) If the frequency of visits between two siblings is reduced to less than twice per month, the

frequency of each such child's visits with the other sibling(s), if any, and of the other siblings' visits with each other shall not be reduced unless also in accordance with this Paragraph or Paragraph 13 or by order of a court. The Department shall neither reduce nor seek to have a court reduce the frequency of visits based on the unavailability of a supervisor for the visits or as a form of discipline.

(b) Visits scheduled to begin within two weeks after DCFS assumes temporary custody of a sibling pursuant to subparagraph 13(a) may begin sooner if the siblings express a desire to see each other, no court has prohibited visits, and a qualified supervisor, if deemed necessary, and an appropriate time and location for visits have been identified.

(c) A sibling visitation plan, specifying the frequency of sibling visits, shall be developed by the siblings' caseworker(s), foster parents, and the children (seven years old and older) within 30 days of temporary custody of the siblings. The sibling visitation plan shall be included in the children's case plans.

(d) The sibling visitation plan shall also specify the duration of sibling visits and may also include the location and supervision to be provided for

visits. A brief statement of the reasons for selecting the frequency and duration of sibling visits as specified in the visitation plan shall also be recorded in the plan.

(e) The sibling visitation plan may be amended as often as necessary to reflect changes made in accordance with this Consent Decree in the frequency, length, location, supervision, or other provisions for visits. No such change, however, shall be made without prior consultation with the siblings (seven years old and older) and with the siblings' foster parents. The sibling visitation plan and its implementation shall be reviewed at each child's administrative case review.

15. For all siblings in DCFS custody as of 180 days after entry of this Decree, a sibling visitation plan as described in subparagraph 14(a) shall be developed no later than 210 days after the entry of this Decree.

16. (a) By 180 days from entry of this Decree, DCFS shall establish a protocol to guide workers in determining the appropriate length and location of sibling visits. This protocol shall be designed to guide workers in determining what is a visit of sufficient length to, among other things, permit siblings the opportunity for meaningful interaction, which generally would

consist of visits of at least two hours. The details of a visitation plan for siblings, including the length of such visits, are to be determined based on the individual circumstances of the children, taking into account, for example, the age of the siblings, their relationship, any behavioral or functional difficulties, and any other factors affecting the best interests of the siblings.

(b) The protocol shall also address issues relating to visits between a child in DCFS's custody and siblings in the custody of a parent. Through the application of the protocol, DCFS shall consider the appropriateness of such visits in developing a visitation plan for each child in its custody. If visits are appropriate, DCFS shall include them in the visitation plan. If DCFS determines that such visits are not appropriate, it shall briefly identify the reasons for its determination in the visitation plan. As part of good family service planning, DCFS shall encourage parents to permit children in their custody to visit with their siblings in DCFS custody. Where necessary, DCFS shall counsel the parent on the importance of the children maintaining or developing ties with each other. Nothing in this Consent Decree, however, shall require DCFS to impose visitation requirements on children not in its custody or to ensure

that visits occur between children at home and children in DCFS custody.

17. Sibling visits are to be supervised when in the professional judgment of the caseworker:

(a) one sibling may physically, mentally, or emotionally harm another during the visit as determined by prior observation or documentation of their interaction;

(b) the children are too young to be left unsupervised;

(c) the purpose of the visit is to assess the interaction between the siblings; or

(d) a court has ordered that visits for the siblings be supervised.

18. The occurrence of sibling visits shall be recorded in the case file.

19. When consistent with good social work practice, the sibling visitation plan may be included as a part of and implemented in coordination with a plan for parent-child visits developed in accordance with 89 Ill. Adm. Code. § 305.7. The frequency of sibling visitation required by this Consent Decree, however, shall in no way be affected by the failure of any parent to visit his or her child(ren) for any reason.

TRAINING

20. Not later than 12 months from the date of entry of this Decree, DCFS shall ensure that all DCFS and private agency staff responsible for ensuring that siblings are placed together or are provided with sibling visits, including caseworkers, supervisors, and administrative case reviewers have been trained as to the rules, policies, protocols, and procedures that have been or will be promulgated and effectuated pursuant to this Consent Decree and the duty of each employee to carry out his or her respective responsibilities. The training shall specifically include information on sibling relationships, the importance of developing and maintaining them, the importance of placing siblings or subgroups of siblings together, and the importance of sibling contact and visitation. The training shall also address the factors to be considered in exercising professional judgment in developing a sibling visitation plan and in applying the protocol specified in Paragraph 16 of this Decree. Defendant shall also ensure that such training is provided to all such staff on a regular and periodic basis thereafter and to all new DCFS and private agency staff responsible for ensuring that siblings are placed

together or are provided with sibling visits, prior to such staff assuming their responsibilities.

21. Not later than 12 months from the date of entry of this Decree, DCFS shall have provided all foster parents training on sibling relationships, the importance of developing and maintaining them, the importance of placing siblings or subgroups of siblings together, and the importance of sibling contact and visitation. As of the same date, DCFS shall ensure that all new foster parents receive such training, prior to placing children in their homes. DCFS shall provide such training to foster parents on a regular and periodic basis thereafter.

22. Defendant shall provide plaintiffs' counsel with 30 days' advance notice of all DCFS training sessions described in Paragraphs 20 and 21 and, upon request of plaintiffs' counsel, 30 days' advance notice of private agency training sessions. DCFS shall also provide plaintiffs' counsel with copies of the materials to be used at such sessions and shall permit plaintiffs' counsel or their designees to attend DCFS, private agency, and foster parent training sessions at least once a year until December 1, 1995.

MONITORING AND NOTICE

23. Defendant shall provide to plaintiffs' counsel drafts of all new or amended policies, procedures, programs, protocols, rules, regulations, and notices for implementation of the provisions of this Consent Decree at least 30 days prior to the relevant effective date specified in this Consent Decree or 30 days prior to their submission for publication in the Illinois Register pursuant to Ill. Rev. Stat. ch. 127, para. 1005.01 (1981), whichever is earlier. Plaintiffs' counsel shall inform defendant's counsel within that time of any objections they have to any such drafts because of plaintiffs' contention that said draft may violate the terms of this Consent Decree. The parties shall negotiate in good faith regarding any such objections. If the parties are unable to reach an agreement, plaintiffs may file a motion with the Court seeking resolution of the dispute. Notwithstanding the provisions of this paragraph, the parties agree that DCFS shall not be required to replicate the language of any provision of this Consent Decree in departmental rule, procedure, or policy guide.

24. On or before 6 months from the date of entry of this Decree, plaintiffs' counsel and defendant shall devise a plan for gathering on a semi-annual basis reli-

able and valid information necessary to measure and ensure compliance with the terms of this Consent Decree. Pursuant to the plan, defendant shall provide plaintiffs' counsel information semi-annually on at least the following:

- (a) The number of sibling groups in DCFS care.
- (b) The number of sibling groups in DCFS care in which all the siblings in care are placed together.
- (c) The number of sibling groups in DCFS care in which all the siblings are not placed together.
- (d) Quality assurance site review results regarding a statistically relevant random sample of children not placed together and the reasons why all the children were not placed together. Plaintiffs' counsel will have an opportunity to review and comment on the questionnaire to be used in conducting the site reviews and, upon seven days' request, shall have access to case files of all children studied.

25. The Department shall provide timely and adequate written notice to each plaintiff and his or her attorney and guardian ad litem of all appealable decisions regarding his or her placement, visitation, or contact with siblings, in accordance with the requirements

of 89 Ill. Adm. Code § 309 or as otherwise provided by statute or regulation.

26. If the Department decides to separate siblings who are placed together, it shall notify each child (if seven years old or older) and the children's attorney and guardian ad litem in writing no later than ten days prior to the implementation of its decision unless the joint placement poses an imminent risk of harm to one or more of the children. In such a case, the Department shall notify each child (seven years old and older) and the children's attorney and guardian ad litem in writing no later than five days after its decision.

27. Defendant shall designate a liaison to respond to and act upon complaints or questions raised by plaintiffs' counsel or by an attorney or guardian ad litem for any class member regarding the implementation of this Consent Decree.

JURISDICTION AND MODIFICATION

28. This Court retains continuing jurisdiction over this case to enforce compliance with the Consent Decree for a period of three years from the approval of this Consent Decree by this Court, at which time the Consent Decree will expire unless extended pursuant to Paragraph 29.

29. Prior to the expiration of this Decree, plaintiffs may file a motion with this Court seeking to extend the expiration date and to continue this Court's jurisdiction, upon a showing that DCFS has not substantially complied with the terms of this Decree.

30. Prior to the expiration of this Decree, plaintiffs may file a motion with this Court at any time seeking to compel DCFS's compliance with the provisions of this Consent Decree. Any proceedings brought to enforce the provisions of this Consent Decree shall be litigated in this Court, and shall not be heard unless plaintiffs' counsel has notified DCFS in writing of their intent to begin an enforcement action not less than 30 days prior to bringing such action, and DCFS has failed to take adequate corrective action. DCFS's failure to abide by a requirement of this Consent Decree in the case of a single child or family, by itself, shall not form the basis for a finding of contempt under this Consent Decree.

31. Any party may file a motion with this Court at any time seeking modification of the terms of this Consent Decree in accordance with existing federal law.

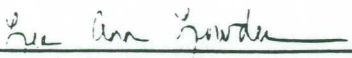
32. Nothing in this Consent Decree shall limit the power or authority of any of the circuit courts of Illi-

nois to order joint placement or more frequent visitation than that required by this Decree in an individual case, upon a showing of need not common to the class as a whole or based on claims distinct from the claims raised in this suit. However, the Public Guardian, his representatives, and successors shall not systematically seek from the state court orders requiring joint placement or visitation in excess of that required by this Consent Decree.

33. The provisions of this Decree shall constitute a complete resolution of the claims in this action as to the class previously certified by the Court in this action. Plaintiffs did not assert, and this Decree does not resolve, any claims for damages based on the allegations set forth in the Complaint.

34. Plaintiffs have requested, and DCFS has agreed to pay, a total of \$12,500.00 in full satisfaction of plaintiffs' claim for costs, expenses and reasonable attorneys' fees in this action. This amount is to be paid by DCFS to the Cook County Public Guardian Fund for Indigents within 120 days of the entry of this Decree.

AGREED TO:


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ENTERED: 
Ann C. Williams
United States District
Judge

DATED: MAR 11 1994