

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

RICKY PRICE, SHANDALL THOMAS,)	
THOMAS HOUSER, and ANTHONY)	
WILLIAMS,)	
)	Case No. 21-cv-542
Plaintiffs,)	
v.)	Hon. Virginia M. Kendall
)	
FEDERAL BUREAU OF PRISONS;)	Mag. Judge Jeffrey I. Cummings
MICHAEL CARVAJAL, Director of the)	
Federal Bureau of Prisons; RUSSELL)	
HEISNER, Warden of the Metropolitan)	
Correctional Center; MARY BETH PENCE,)	
Health Administrator of the Metropolitan)	
Correctional Center,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

1. Plaintiffs Ricky Price, Shandall Thomas, Thomas Houser, and Anthony Williams, residents of the Chicago Metropolitan Correctional Center (MCC), on behalf of themselves and other putative class members, hereby move for entry of a preliminary injunction pursuant to Federal Rule of Civil Procedure 65 against Defendants Federal Bureau of Prisons, Michael Carvajal, Director of the Federal Bureau of Prisons, Russell Heisner, Warden of the MCC, and Mary Beth Pence, Health Administrator of the MCC.
2. In support of this motion, Plaintiffs submit a memorandum of law and accompanying exhibits.

3. Following a judgment in their favor, Plaintiffs respectfully request that the Court enter a preliminary injunction requiring the Defendants to:

- a. Develop and implement an educational program targeted at all MCC staff and residents, in collaboration with local, state, and federal health officials, to maximize COVID-19 vaccine education and uptake;
- b. Develop and implement a COVID-19 vaccination plan for all residents and MCC staff to allow for the vaccination of all willing MCC staff and residents as soon as practicable;
- c. Promptly implement SARS-CoV-2 testing procedures for regular surveillance testing of all staff and detainees, diagnosis of symptomatic individuals, and tracing of known contacts;
- d. Consult with or retain an independent infectious disease or public health expert to advise and monitor COVID-19 control efforts at MCC; and
- e. Acquire and distribute CDC-endorsed facial coverings to all MCC staff and residents on an at least weekly basis and strictly enforce mandatory facial covering rules for all MCC staff and residents.

Dated: April 13, 2021

Respectfully submitted,

/s/ Camille E. Bennett

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on April 13, 2021, she caused a copy of the foregoing to be filed using the Court's CM/ECF system. I further certify that I, or another one of Plaintiffs' attorneys, will promptly serve a copy of the same on counsel for Defendants via email.

/s/ Camille E. Bennett