

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT

MASSACHUSETTS CORRECTIONAL
LEGAL SERVICES,

Plaintiff,

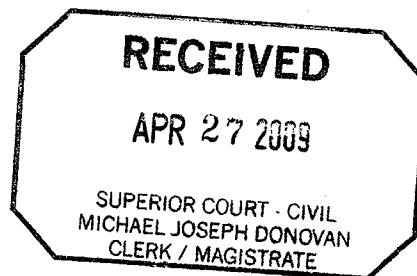
v.

HAROLD W. CLARKE,
Commissioner of Correction,

Defendant.

CIVIL ACTION

No. _____



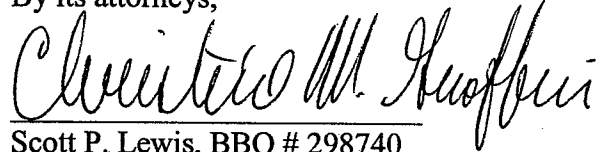
**MASSACHUSETTS CORRECTIONAL LEGAL SERVICES'
MOTION FOR PRELIMINARY INJUNCTION**

The plaintiff, Massachusetts Correctional Legal Services ("MCLS"), moves for a preliminary injunction against the defendant, Harold W. Clarke ("Clarke"), Commissioner of the Massachusetts Department of Correction ("DOC"). MCLS seeks narrow, but immediate relief: access to certain public records requested by the MCLS under the Public Records Act, G.L. c. 66, § 10, which the DOC has unlawfully withheld from MCLS.

Specifically, MCLS moves that the Court enter a preliminary injunction ordering the DOC to immediately disclose to MCLS the "selection tool" the DOC is using to make assignments of maximum security inmates to double-bunked cells at Souza-Baranowski Correctional Center and the "Quay lesson plans."

In support of this motion, MCLS relies on its Verified Complaint and Memorandum in
Support of Motion for Preliminary Injunction.

By its attorneys,



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Christine M. Griffin, BBO # 651401

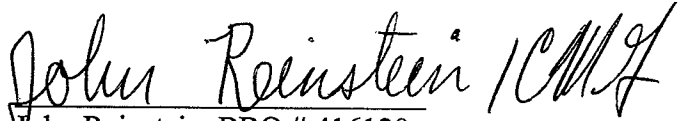
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