

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

PAUL MURPHY, et al., individually	)	
and on behalf of all others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	
	)	16 C 11471
v.	)	
	)	
LISA MADIGAN, et al.,	)	Judge Kendall
	)	
Defendants.	)	

**PLAINTIFFS’ REPLY IN SUPPORT OF THEIR  
MOTION FOR CLASS CERTIFICATION**

Plaintiffs seek to certify this case as a class action pursuant to Fed. R. Civ. P. 23(b)(2) for purposes of seeking classwide injunctive relief. Plaintiffs further seek an order appointing class counsel. In their response, Defendants “do not oppose certification of the class as defined in Plaintiffs’ motion, nor do they oppose Plaintiffs’ motion for appointment of class counsel.” Dkt. 48 at 1.

Accordingly, Plaintiffs respectfully request that this Court enter an order certifying that this case may be maintained as a class action on behalf of a class defined as follows: “All persons who have been sentenced to a term of three years to natural life of MSR who are currently detained in an IDOC facility beyond their MSR dates because of an inability to find an approved host site.” Plaintiffs further request that the Court enter an order appointing Mark G. Weinberg and Adele D. Nicholas as class counsel.

Respectfully submitted,

/s/ Adele D. Nicholas

/s/ Mark G. Weinberg  
*Counsel for Plaintiffs*

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