

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

K.Y., a minor, et al.,

Plaintiffs,

v.

DISTRICT OF COLUMBIA, et al.,

Defendants.

Civil Action No. 1:24-cv-03056 (CJN)

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs respectfully move this Court for a preliminary injunction requiring Defendants District of Columbia and Sam Abed, Director of the D.C. Department of Youth Rehabilitation Services (“DYRS”), to:

1. Within 14 days of the date of a preliminary injunction order (“this Order”), ensure that all children currently at the Youth Services Center (“YSC”) who have been awaiting placement for 30 days or longer as of the date of this Order are moved to placements that meet their rehabilitative needs;
2. Within 21 days of the date of this Order, ensure that all children currently at YSC who have been awaiting placement for 10 days or longer as of the date of this Order are moved to placements that meet their rehabilitative needs;
3. Ensure that all children currently at YSC who have been awaiting placement for fewer than 10 days as of the date of this Order, and all children who are committed to DYRS custody on or after the date of this Order, are moved to placements that meet their rehabilitative needs within 30 days of this Order or of their commitment (whichever is later);
4. For all children who are committed to DYRS custody on or after the date of this Order, complete initial assessments and individualized treatment plans within the timelines set out in D.C. Code § 16-2319 (absent the invocation of an exception in accordance with the procedures of that statute); and
5. On each Monday for the duration of this litigation (or the next business day if the Monday is a District of Columbia or federal holiday), file under seal with the Court a list, marked CONFIDENTIAL in large letters at the top of each page, of all individuals currently detained at YSC who have been committed to

DYRS custody, along with each individual's date of commitment to DYRS, duration of detention at YSC following commitment to DYRS, date of initial assessment (if any), date of individualized treatment plan (if any), and anticipated date on which the individual is to be moved to a placement that meets their rehabilitative needs.

In compliance with Local Civil Rule 7(m), Plaintiffs' counsel conferred with Defendants' counsel, who oppose this Motion. Plaintiffs also request that this Court set a date for a hearing, pursuant to Local Civil Rule 65.1(d). An accompanying Memorandum of Law in support of this Motion and a Proposed Order are attached.

Date: October 30, 2024

Respectfully submitted,

/s/ Megan Yan

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Counsel for Plaintiffs

* Application for admission *pro hac vice* forthcoming; application for admission to the D.C. bar forthcoming; practice limited to federal courts.

CERTIFICATE OF SERVICE

I hereby certify that I will cause a copy of the foregoing Motion for a Preliminary Injunction and accompanying Memorandum of Law to be served on Defendants. I certify that I emailed a copy of these documents to Defendants' counsel on October 30, 2024.

/s/ Megan Yan
Megan Yan