

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JESSICA HICKLIN,)
)
 Plaintiff,)
)
 v.)
)
 ANNE PRECYTHE, *et. al.*,)
)
 Defendants.)

Case No. 4:16-cv-01357-NCC

**DEFENDANTS ANNE PRECYTHE, JOAN REINKEMEYER, CINDY GRIFFITH,
STAN PAYNE, SCOTT O’KELLY and LATOYA DUCKWORTH’S RESPONSE TO
PLAINTIFF’S MOTION FOR PERMANENT INJUNCTION**

COME NOW Defendants Anne Precythe, Joan Reinkemeyer, Cindy Griffith, Stan Payne, Scott O’Kelly and Latoya Duckworth (“MDOC Defendants”), by and through their counsel, and respectfully submit the following response to Plaintiff’s Motion for Permanent Injunction:

1. MDOC Defendants do not oppose Plaintiff’s Motion for Declaratory Relief and Permanent Injunction [Doc. 163] or the relief therein requested, upon the understanding that MDOC Defendants’ obligation to provide *medical* care to Ms. Hicklin will be discharged through the Missouri Department of Corrections’ medical contractor, Corizon Health, Inc. or its successors.

2. MDOC Defendants reserve the right to challenge the reasonableness of attorney’s fees accrued by counsel for Plaintiff.

3. MDOC Defendants take no position on Plaintiff's "Statement of Uncontroverted Facts" or any other material included in Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Declaratory Relief and Permanent Injunction [Doc. 164].

Dated: April 4, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of April 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all parties.

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