

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THHERESA VICTORY, et al.,	:	
	:	
Plaintiffs,	:	CIVIL ACTION NO. 18-05170
	:	
v.	:	
	:	
BERKS COUNTY, et al.,	:	
	:	
Defendants.	:	

NOTICE TO THE COURT

Defendants The County of Berks, Commissioner Kevin S. Barnhardt, Commissioner Christian Y. Leinbach, Commissioner Mark C. Scott, Esquire, Warden Janine L. Quigley, and Deputy Warden Smith (hereinafter “Berks Defendants”) by and through their attorneys, The MacMain Law Group, LLC, hereby file this Notice to the Court to advise that the Berks County Board of Commissioners have voted to move the inmates that have been housed at the Berks County Community Reentry Center (CRC) to the Berks County Jail. As of November 8, 2019, the CRC is no longer a housing unit holding any inmates of the Berks County Jail System. All inmates, male and female, that are incarcerated at the Berks County Jail System are being housed at the Berks County Jail. All male trusty inmates and all female trusty inmates are currently housed in cells in the jail.

Respectfully submitted,

THE MACMAIN LAW GROUP, LLC

Date: November 8, 2019

By: /s/ Matthew J. Connell
Matthew J. Connell, Esquire
Samantha A. Ryan, Esquire
P.A. I.D. Nos. 80246/320553
433 West Market Street, Suite 200
West Chester, Pennsylvania 19382
Tel: (484) 318-7803
Fax: (484) 328-3996
Attorneys for Berks Defendants

CERTIFICATE OF SERVICE

I, Matthew J. Connell, hereby certify that on this 8th day of November, 2019, I caused a true and correct copy of the foregoing *Notice to the Court* to be served upon the following via the ECF system of the United States District Court for the Eastern District of Pennsylvania:

Su Ming Yeh, Esquire
Angus Love, Esquire
Matthew A. Feldman, Esquire
Alexandra Morgan-Kurtz, Esquire
Pennsylvania Institutional Law Project
718 Arch Street, Suite 304S
Philadelphia, PA 19106

Will W. Sachse, Esquire
Cory A. Ward, Esquire
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104-2808

Attorneys for Plaintiffs

Respectfully submitted,

Date: November 8, 2019

By: s/ Matthew J. Connell
Matthew J. Connell, Esquire
Samantha A. Ryan, Esquire
Laurie Anne Fiore, Esquire
PA ID Nos. 80246 / 320553 / 81373
433 W. Market Street, Suite 200
West Chester, PA 19382
Attorneys for Berks Defendants