

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Other - Civil

Tanya Mae Wagner, Dale Allen Jones,
DeAndre Jerome Barnes, Michael Lee Doering,
and Robert Rosas Sr. on behalf of themselves
and all others similarly situated,

Court File No. 62-cv-22-4459
(Hon. Mark Ireland)

STIPULATION FOR DISMISSAL

Plaintiffs,

vs.

Minnesota Department of Corrections,

Defendant.

Pursuant to Minnesota Rule of Civil Procedure 41.01(a), Plaintiffs Tanya Mae Wagner, Dale Allen Jones, DeAndre Jerome Barnes, Michael Lee Doering, and Robert Rosas Sr. and Defendant Minnesota Department of Corrections (DOC), by and through their respective undersigned counsel, stipulate to the following:

1. As of the date of this stipulation, Plaintiffs Barnes, Rosas, and Wagner are serving their criminal sentences in the community on conditional medical release.
2. As of the date of this stipulation, Plaintiffs Doering and Jones are serving their criminal sentences in the community on supervised release.
3. Plaintiffs Barnes, Rosas, and Wagner shall remain on conditional medical release until they reach their supervised release dates, at which time they will transition to traditional supervised release. The DOC shall not rescind Plaintiffs Barnes, Rosas, or Wagner's conditional medical release under Minn. Stat. § 244.05, subd. 8(e). Upon a finding that Plaintiffs Barnes, Rosas, or

Wagner have violated their conditional medical release conditions, the DOC may seek to revoke their conditional medical release in accordance with Minn. Stat. § 244.05, subds. 3 & 8(f).

4. The DOC shall modify Plaintiffs Barns, Rosas, and Wagner's conditional medical release conditions, which currently include strict home confinement, to allow them to be employed outside their homes and to pursue education outside their homes with approval from their supervision agents.

5. All claims and causes of action stated in Plaintiffs' complaint against Defendant shall be dismissed.

6. All parties will bear their own costs, disbursements, and attorneys' fees.

7. The court may forthwith sign the proposed order of dismissal and enter judgment thereupon.

Dated: December 15, 2023

/s/

JaneAnne Murray (#394887)
Mary Hill (Student Certified Attorney)
UNIVERSITY OF MINNESOTA LAW SCHOOL
CLEMENCY CLINIC
229 19th Avenue South
Minneapolis, MN 55419
Tel.: (612) 339-5160
Murrayj@umn.edu
Hill1994@umn.edu

Daniel R. Shulman (#0100651)
Teresa Nelson (#0269736)
AMERICAN CIVIL LIBERTIES UNION OF
MINNESOTA.
P.O. Box 14720
Minneapolis, MN 55414
Tel.: (651) 645-4097
DShulman@ACLU-MN.org
TNelson@ACLU-MN.org

Bradford Colbert (#166790)
Jackson Fate (Student Certified Attorney)
LEGAL ASSISTANCE TO MINNESOTA
PRISONERS
MITCHELL HAMLINE SCHOOL OF LAW
875 Summit Avenue
St. Paul, MN 55105
Tel: (651) 290-8651
Brad.Colbert@mitchellhamline.edu
Jackson.Fate@mitchellhamline.edu

ATTORNEYS FOR PLAINTIFFS

Dated: December 15, 2023

KEITH ELLISON
Attorney General
State of Minnesota

/s/ Corinne Wright

CORINNE WRIGHT
Assistant Attorney General
Atty. Reg. No. 0390353
445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2127
(651) 757-1198 (Voice)
(651) 297-4139 (Fax)
corinne.wright@ag.state.mn.us

JOSEPH WEINER
Assistant Attorney General
Atty. Reg. No. 0389181
445 Minnesota Street, Suite 1400
St. Paul, Minnesota 55101-2131
(651) 757-1431 (Voice)
(651) 282-5832 (Fax)
joseph.weiner@ag.state.mn.us

ATTORNEYS FOR DEFENDANT