

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION**

NICOLE K. and ROMAN S., by next friend
Linda R.; ABIGAIL R., LILY R., and
RACHEL H., by next friend Nancy B.; and
ANNA C., BRIAN P., AMELIA P.,
ALEXA C., and ZACHARY H., by next
friend Jessie R.; for themselves and those
similarly situated,

Plaintiffs,

v.

MARION COUNTY, LAKE COUNTY,
and SCOTT COUNTY, INDIANA

Defendants.

Case No.: 3:19-cv-00025

JURY TRIAL DEMANDED

CLASS ACTION COMPLAINT

Index of Exhibits

American Bar Association, Section of Litigation, Model Act Governing the Representation of Children in Abuse, Neglect, and Dependency Proceedings and Report to the House of Delegates (Aug. 2011)	Exhibit 1
Indiana State Office of GAL/CASA, Program Standards	Exhibit 2
Indianapolis Business Journal, <i>Report: Indiana Putting Children in Foster Care at Twice National Rate</i> (Feb. 1, 2018)	Exhibit 3
Letter from M. Bonaventura, Director of Indiana Department of Child Services, to Governor E. Holcomb, dated December 12, 2017	Exhibit 4
Excerpt of Institute of Judicial Administration/ American Bar Association, Juvenile Justice Standards, Standards Relating to Counsel for Private Parties, Std. 1.1 (1980)	Exhibit 5
Fisher et al., <i>A translational neuroscience perspective on the importance of reducing placement instability among foster children</i> , 92(5) Child Welfare 9-36 (2013)).	Exhibit 6
Zinn, A. & Slowriver, J. (2008), <i>Expediting Permanency: Legal Representation for Foster Children in Palm Beach County</i> . Chapin Hall Center for Children at the University of Chicago).	Exhibit 7

<p>U.S. Department of Health and Human Services, Administration for Children and Families, Children's Bureau, <i>Information Memorandum: High Quality Legal Representation for All Parties in Child Welfare Proceedings</i>, ACYF-CB-IM-17-02, January 17, 2017.)</p>	<p>Exhibit 8</p>
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