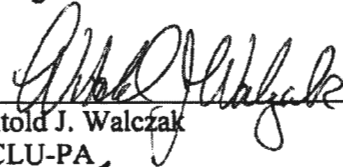
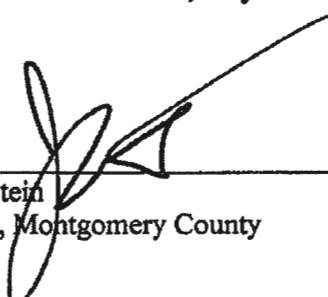
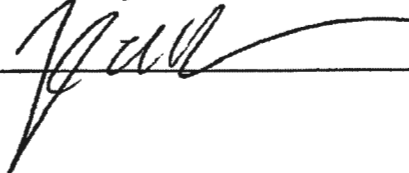


- not limited to lawyers affiliated with Plaintiff ACLU-PA, to present documentation or evidence of an attorney-client relationship.
3. Nothing in this Order prevents Defendants from enforcing necessary institutional security or public health measures for professional visits. Defendants may implement reasonable, content-neutral, time, place and manner restrictions on professional visits, including those involving ACLU-PA-affiliated lawyers.
 4. Nothing in this Order prevents Defendants from limiting or even excluding attorneys from remote or in-person visits based on the attorney's or para-professional's substantial misconduct or intentional failure to comply with reasonable content-neutral time, place and manner restrictions.
 5. This Order shall remain in effect from this day forward, unless modified by further Order of this Court.
 6. This Court shall maintain jurisdiction to enforce this Consent Order, via motions for specific performance or contempt.
 7. This Order does not affect or resolve Plaintiff's demand for attorneys' fees. The parties shall within thirty days notify the Court whether they have resolved the issue of attorneys' fees or whether Plaintiff will file a Petition for Fees, which the Court shall adjudicate in due course.
 8. The parties agree that this Court may administratively close this matter, subject to re-opening based on motion of either party.

/s/ 
Witold J. Walczak
ACLU-PA

/s/ 
Joshua Stein
Solicitor, Montgomery County

/s/ 

John A. Freedman
Arnold & Porter Kaye Scholer LLP

Attorneys for Plaintiff

Attorney for Defendants

This ORDER is hereby **APPROVED** on this 24th day of May, 2021, and the relief set forth herein is **GRANTED**.


U.S.D.J.