

Motion for Immediate Relief

Exhibit 13



U.S. Department of Justice

Civil Rights Division

SYC:JCP:DD:MRB:TDM:RAK:EAG:YD:kc
DJ 168-19-74, 75;
168-19m-68, 69, 70;
168-20-45, 46

*Special Litigation Section - PHB
950 Pennsylvania Avenue, NW
Washington, DC 20530*

November 18, 2009

BY FIRST CLASS MAIL AND EMAIL

Mary Lou Rahn
2 Peachtree Street, N.W.
Suite 22256
Atlanta, GA 30303

Jason Naunas, Esq.
Department of Law
State of Georgia
40 Capitol Square S.W.
Atlanta, Georgia 30334-1300

Re: United States v. Georgia, No. 1:09CV-119-CAP (N.D. Ga.)

Dear Ms. Rahn and Mr. Naunas:

We write to request additional information relating to a suicide attempt at East Central Regional Hospital ("ECRH"). The incident reportedly occurred on September 22, 2009, on the adult mental health unit at the Augusta campus, A side. We received the Critical Incident report regarding the incident on September 24, 2009, and the Investigative Report on October 30, 2009.

We request additional information, pursuant to Section IV.G. of the Settlement Agreement, so that we may evaluate the adequacy of the State's handling of this incident, particularly in light of the Settlement Agreement's requirement that the state attain substantial compliance with the terms regarding suicide risk assessment and prevention no later than January 15, 2010. We ask that the State provide its response to the following requests within 30 days, or no later than December 18, 2009:

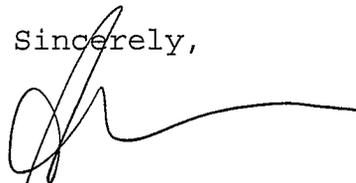
1. The suicide prevention protocol and other policies applicable to the handling of this incident.

2. The intake assessments and risk assessments for this patient from the time of admission to the time of this incident.
3. The patient's treatment plan, and any safety plan or revisions to the this patient's treatment plan developed by a clinical team to ensure this patient's safety, particularly given the history of a prior, similar suicide attempt in January 2009 that is noted in the Investigative Report dated October 15, 2009.
4. All communications and documents provided by Central State Hospital to East Central State Hospital concerning this patient.
5. All progress notes for this patient from September 15, one week prior to the September 22 incident, through September 23, 2009, including physician notes, psychiatrist notes, psychologist notes, nursing notes and health service technician notes, if any.
6. The staffing sheets for September 22, 2009 for this unit, including all enhanced supervision levels.
7. The emergency room discharge sheet.
8. The Hospital police log, switchboard log and phone log that establish who called for emergency assistance, and at what time.
9. The emergency code flow sheet and all documentation surrounding review of the emergency code.
10. Any root cause analysis, staffing analysis, or other management review and analysis of this incident
11. A description of any corrective action plans responsive to any findings identified in the analyses noted in request ten (10) above.

If you should have any questions about this request, please feel free to contact me at (202) 514-6255, Mary Bohan at (202) 616-2325, Timothy D. Mygatt at (202) 305-3334,

Dave Deutsch at (202) 514-6270, Robert Koch at (202) 305-2302, or
Emily Gunston at (202) 305-3203.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shanetta Y. Cutlar', with a long horizontal flourish extending to the right.

Shanetta Y. Cutlar
Chief
Special Litigation Section

cc: Commissioner Frank Shelp