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**BY ELECTRONIC MAIL**

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Re: Supplement to Defendants' Non-Compliance with MCD Provisions on Placements

Dear David, Steve, Judy, Kathleen, and Elissa:

Plaintiffs wish to supplement and amend their June 12 non-compliance letter. We recently learned that the Ascensions high-intensity group home run by Arrow Ministries has closed, resulting in a loss of approximately 27 beds. These are the same beds that had been converted from "diagnostic" beds in 2021, as discussed in our June 12 letter. We are unaware of any plans for replacing the beds.

According to the most recent BCDSS reports, as of June 23, five children have been in hotels and seven children have been in hospital overstays during the past week.

Let us know if you have any questions. We look forward to discussing these important issues.

Very truly yours,

/s/ Mitchell Y. Mirviss  
/s/ Stephanie S. Franklin

cc: Rhonda B. Lipkin, Esq.  
Lisa Mathias, Esq.  
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