

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ANAS A. DOWL, inmate
#345639, and

ERNEST A. JACOBSSON,
inmate #403566,

Plaintiffs,

v.

Dean Williams, Commissioner,
Alaska Department of
Corrections¹

Defendant

No. 3:18-cv-0119-HRH

ACLU OF ALASKA FOUNDATION
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MOTION TO ENFORCE SETTLEMENT AGREEMENT

William Gary, Tristan Grant, and Clarence Taylor, by and through their attorneys, the American Civil Liberties Union of Alaska Foundation, hereby move to enforce the Settlement Agreement in the above-captioned case. The Settlement Agreement was jointly filed for the Court's review on September 5,

¹ Jen Winkelman is now Commissioner of Alaska Department of Corrections, not Dean Williams. Pursuant to Civil Rule 25(d), Ms. Winkelman should be substituted. But in the interest of clarity for this first filing, counsel is using the name on the caption from the Judgment.

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2019, was approved by the Court in its judgment dated September 6, 2019, retained jurisdiction for enforcement purposes, and is enforceable by “all individuals who are impacted” by its terms as third-party beneficiaries.

The three people named above are inmates at Anchorage Correctional Complex who practice Islam. Alaska Department of Corrections is currently violating the Settlement Agreement in a way that directly harms them. Therefore, they respectfully ask this Court to enforce it. This Motion is supported by the attached Memorandum.

DATED March 5, 2025

Respectfully submitted,

**American Civil Liberties Union of
Alaska Foundation**

/s/ Ruth Botstein

Ruth Botstein, Alaska Bar No. 9906016

Doron Levine, Alaska Bar No. 2101002

(District Court Admission
forthcoming)

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Pro Bono Counsel for Plaintiffs

CERTIFICATE OF SERVICE

On March 5, 2025, this document was filed through the CM/ECF system of the Court, which automatically serves an electronic copy on all counsel of record. Courtesy copies of this motion, along with exhibits and affidavits, were also sent to:

Treg Taylor, treg.taylor@alaska.gov
Mark Cucci, mark.cucci@alaska.gov

By: /s/ Ruth Botstein
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