IN SUPPORT OF APPEARANCE
BEFORE FOUNDATION OF AMERICA
UNITED CEREBRAL PALSY ASSOCIATIONS AND
ASSOCIATION FOR RETARDED CITIZENS,
BRIEF OF AMICI CURIAE, NATIONAL

ON Writ of Certiorari to the United States

Respondents:
"TERRI LEE HALDEMAN, et al.,

Petitioners,
"PENNHEIM, STATE SCHOOL AND HOSPITAL, et al.,

October Term, 1980

Supreme Court of the United States

IN THE
Federal Statutes:

131, 16, 33

New York State Association for Retarded Citizens v. Carey


Kentucky Association of Retarded Citizens v. Commonwealth

Hawaii v. Bishop, 400 F. 2d 287 (9th Cir. 1968)


Reed v. Reed, 404 F. 2d 287 (9th Cir. 1968)

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<td>Social Security Amendments of 1967, 42 U. S. C. § 1382</td>
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Other Authorities:


Other Federal Materials:

C. Federal Register, vol. 59, no. 120 (1994).

Other State Materials:

C. New York State Register, vol. 59, no. 120 (1994).
H. New York State Register, vol. 64, no. 170 (1999).
P. New York State Register, vol. 72, no. 250 (2007).
Q. New York State Register, vol. 73, no. 260 (2008).
R. New York State Register, vol. 74, no. 270 (2009).
S. New York State Register, vol. 75, no. 280 (2010).
V. New York State Register, vol. 78, no. 310 (2013).
Y. New York State Register, vol. 81, no. 340 (2016).
The United Cerebral Palsy Associations, Inc., is a national organization that represents and promotes the interests of people with cerebral palsy and their families. The organization works to ensure that people with cerebral palsy have access to quality services and supports, and to raise awareness about the issues facing people with this condition. The organization also advocates for policies that support people with cerebral palsy and their families.

The National Association of Retarded Citizens (NARC) is a national organization that represents the interests of people with intellectual disabilities. The organization works to ensure that people with intellectual disabilities have access to quality services and supports, and to raise awareness about the issues facing people with this condition. The organization also advocates for policies that support people with intellectual disabilities and their families.

The table of authorities (continued):
SUMMARY OF ARGUMENT

These rights are not only of a personal and individual nature, but they are also rights that flow from the very nature of the human person. They are natural rights, inherent in the human being by virtue of his dignity and the relation he bears to society. The argument presented in support of this position is based on the following principles:

1. The right to life, liberty, and the pursuit of happiness are fundamental rights that are inherent in the human being.
2. These rights are not granted by any government, but are inherent in the human being by virtue of his dignity.
3. The government’s role is to protect these rights, not to create them.
4. The government’s role is to create a legal framework that protects and respects these fundamental rights.

In conclusion, the government’s role is to create a legal framework that protects and respects the fundamental rights of the human being. This framework should be based on the principles of liberty, equality, and natural rights, and it should be implemented through the development of legal and institutional mechanisms.
I. The Developmentally Disabled: Assessing the Adequacy of Existing Legal Remedies

II. The Developmental Disabilities: A Brief History of the Movement for Rights

III. The Development of Constitutional Protections for the Developmentally Disabled

IV. The Constitutionality of Constitutional Protections for the Developmentally Disabled

V. The Adequacy of Current Legal Remedies for the Developmentally Disabled

VI. Conclusion

ARGUMENT

...
The Senate report on the bill of rights act emphasizes admission.

Admission is required for residents of the state, and in many instances, this admission is voluntary. The Senate report on the bill of rights act emphasizes admission.

In one major study of the effects of institutionalization, it was found that the strangers, who were placed in another institution, showed evidence of more severe adjustment difficulties than those who remained in the same institution. The strangers exhibited more aggressive behavior, and were more unhappy with their environment. This was true even when the strangers were placed in institutions with similar conditions. These findings are consistent with the conclusions of numerous studies that have compared institutionalized and non-institutionalized groups.

In conclusion, the Senate report on the bill of rights act emphasizes admission. The report states that admission is voluntary, and that institutions are responsible for ensuring that the admission process is fair and just. The report also notes that institutions are responsible for providing adequate care and treatment for institutionalized persons. These findings are consistent with the conclusions of numerous studies that have compared institutionalized and non-institutionalized groups.

The report concludes that admission is voluntary, and that institutions are responsible for ensuring that the admission process is fair and just. The report also notes that institutions are responsible for providing adequate care and treatment for institutionalized persons. These findings are consistent with the conclusions of numerous studies that have compared institutionalized and non-institutionalized groups.

In conclusion, the Senate report on the bill of rights act emphasizes admission. The report states that admission is voluntary, and that institutions are responsible for ensuring that the admission process is fair and just. The report also notes that institutions are responsible for providing adequate care and treatment for institutionalized persons. These findings are consistent with the conclusions of numerous studies that have compared institutionalized and non-institutionalized groups.
The principle of normalization in human services, as developed in the United States, was based on the idea that mentally retarded persons should be treated as normally as possible, according to the norms and patterns of the normal population. This principle is evident in the reopened hearings on the need to focus on the institutionalization of mental retardation, as opposed to the provision of educational and vocational training. The principle of normalization has been adopted in many countries, including the United States, and is based on the idea that mentally retarded persons should be treated as normally as possible, according to the norms and patterns of the normal population. This principle is evident in the reopened hearings on the need to focus on the institutionalization of mental retardation, as opposed to the provision of educational and vocational training.
null
It is against this background that this report should

Stimulated by these problems:

new problems

abnormal new skills, making new friends, communica-

tion—adjusting to new homes and communities.

In the process of

problems, and then hard to cope with

their lives but dissatisfied with others. They expect

the day care centers with others. They expect

their communities.

Study group members spent time in their communities.

they did not differ from the kinds of experiences they

in many ways, the

Pros and cons...
The Philosophy of Mind, 1890.

The idea of an organism as a whole is not new. The concept of an organism as a whole has been around for centuries. However, it was not until the mid-19th century that the idea of an organism as a whole began to gain acceptance. This was due to the work of Charles Darwin, who proposed the theory of evolution by natural selection.

Darwin's theory of evolution by natural selection was a revolutionary idea at the time. He suggested that organisms were not static, but rather changed over time through the process of natural selection. This theory provided a naturalistic explanation for the diversity of life on earth, and it was widely accepted by the scientific community.

In the years following Darwin's work, the idea of an organism as a whole continued to gain traction. This was due in part to the work of other scientists, such as Gregor Mendel, who conducted experiments on the heredity of traits in plants.

Mendel's work was groundbreaking, as it provided evidence for the inheritance of traits from generation to generation. This evidence provided further support for the idea of an organism as a whole, and it helped to establish the field of genetics.

Today, the idea of an organism as a whole is taken for granted. It is a fundamental concept in biology, and it is essential for understanding the workings of the living world.
Brief of Oral Argument

BRIEF OF AMICI CURiae

March 14, 1977

TO WHOM IT MAY CONCERN:

We respectfully submit this brief in support of the petitioners' position in the above-referenced case.

[Signature]

February 15, 1978

TO WHOM IT MAY CONCERN:

We further submit this supplemental brief in support of the petitioners' position.

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held 4, 1979, in which the Hon. M. C. Phelan, 48, C. J. Phila., presented the matter of the proceedings with the individual needs of the residents consistent with the provisions for the maintenance and the preservation of the community.


Phalan, C. J. Phila.

It is clear that the record is replete with evidence of the need for additional funds for the preservation of the community.

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B. Experience Throughout the Nation: Contrasts to Institutional Care

The economic data in Pennsylvania is not aberrant. On the contrary, available evidence from the many
community facilities are in agreement that given appropriate community facilities, all the residents of
Pennhurst, even the most profoundly retarded, have been living, in the community’s opinion, better than at
Pennhurst. The Court further found that the residents of Pennhurst should be treated as members of the
community. In short, in spite of the Court’s reliance on the "community" concept, the residents of
Pennhurst and its subdivisions to provide sufficient living arrangements, had been returned by Philadel-
phia County to the Commonwealth. They were entitled to meaningful care appropriate to their needs in
accordance with Pennsylvania law, and the creation of a suitable program.

It is obvious, therefore, that the posture assumed by the Commonwealth in this litigation and the
involvement of the District Court in this matter, do not concern the question of whether the
Pennsylvania law is consistent with the Federal law, and the requirement of the Federal law is consistent with
Pennsylvania law. The District Court found that the Commonwealth has expressed its agreement with the
mandate of Congress for the creation of community facilities.

Moreover, the District Court found that "all the parties in this litigation are in agreement that given
appropriate community facilities, all the residents of Pennhurst, even the most profoundly retarded, have been
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Received Congress, 173, 1978.


The Right to Community Services, Scheme

Capable Children, 173, 173.

Issuer and State Legislation Related to the Education of Handicapped Students,

Handicapped Children's Education Project, A Summary of

Handicapped Children, 173, 173.

For those


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As a result, the Federal Government has established a comprehensive policy to ensure that all children, regardless of their abilities, receive a quality education. This policy includes federal legislation and funding to support education programs for all children, including those with disabilities.

In addition to the immediate cost reductions resulting from the implementation of these policies, the improved educational outcomes for children with disabilities have led to long-term economic benefits for both the States and the Nation.

Long-Term Economic Benefits for Both the States and the Nation

Handicapped Persons, Disability Discrimination

Measures the Independence and Productivity of

C. By maximizing development potential and

independent, of human lives and human potential.

In brief, the immediate savings from the implementation of these policies have been significant, but the long-term benefits to both the States and the Nation are even more profound.
October 20, 1880

Of Counsel
Philadelphia, Pennsylvania 19102
1719 Rittenhouse Building
Schoenader, Harrison, Street & Lewis

Attorneys For Alliance Curve

Respectfully Submitted

should be affirmed, the protection of the rights of the retarded. In order to the court below as a necessary step forward in the "Hilltop Complexion of America Support the Children's United Cerebral Palsy Association, As Friends of the Court, the National Association for

CONCLUSION

Brief of Alliance Curve