

engaged in and continue to engage in a pattern or practice of conduct by DPD officers of using excessive force against persons in Detroit.

7. The defendants, through their acts or omissions, have engaged in and continue to engage in a pattern or practice of conduct by DPD officers of falsely arresting persons and improperly seizing persons in Detroit.

8. The defendants, through their acts or omissions, have engaged in and continue to engage in a pattern or practice of conduct by DPD officers of failing to secure timely judicial review of warrantless arrests of persons in Detroit.

9. The defendants, through their acts or omissions, have engaged in and continue to engage in a pattern or practice of conduct by DPD officers of failing to protect detainees in DPD holding cells from undue risks of harm by, inter alia, failing to ensure fire safety, failing to provide adequate medical and mental health care, failing to provide adequate supervision, and failing to ensure adequate environmental health and safety conditions.

10. The defendants are, through their acts or omissions, engaging in a pattern or practice of systemic deficiencies that has resulted in the pattern or practice by DPD officers that deprives persons of rights, privileges, and immunities secured or