

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

LOUIS HAMILTON, et al.,	*	CIVIL ACTION
Plaintiffs	*	
VERSUS	*	NUMBER 69-2443
	*	
ERNEST N. MORIAL, MAYOR, et al.,	*	SECTION "LLM"
Defendants	*	AND CONSOLIDATED
	*	CASES
* * * * *	*	

MEMORANDUM IN SUPPORT OF MOTION TO AMEND COMPLAINT

NOW INTO COURT, through undersigned counsel, come plaintiffs who respectfully ask this Court to grant plaintiffs' motion to amend the complaint in this matter for the following reasons.

Bruce Lynn is the Secretary of the Louisiana Department of Public Safety and Corrections.

The Department of Public Safety and Corrections is responsible for approximately 40% of the inmates in the Orleans Parish prison system.

The state defendants are an integral part of the correctional system in place in Orleans Parish and need to be an integral part of this action if complete relief is granted for plaintiffs' claims.

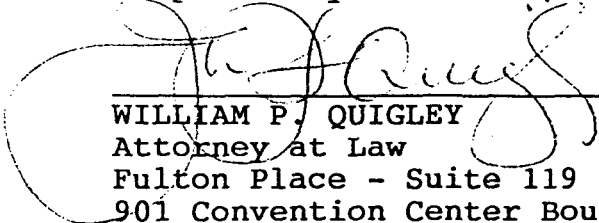
The state can claim no prejudice from this amendment since they have been present in this matter for years and have been participating in all proceedings in this matter by counsel for the past year and a half.

The grant of leave to amend under Rule 15 is within the discretion of the trial court, Zenith Radio Corporation v Hazel

Time Research, Inc., 401 U.S. 321, 330 (1971), and amendments are to be allowed freely. Foman v Davis, 371 U.S. 178 (1962).

Therefore, plaintiffs respectfully request that the motion to amend the complaint be granted.

Respectfully submitted,



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Certificate of Service

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding by mailing the same to each by first class United States mail, properly addressed and postage prepaid on this 7 day of 9, 1990.