

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

FILED
U.S. DIST COURT
MIDDLE DIST. OF LA

2003 DEC 31 A 10: 59

BY DEPUTY CLERK *[Signature]*

98-947-B

HAYES WILLIAMS, et al.)
Plaintiffs,)

v.)

Civ. No. 71-98-B

JOHN MCKEITHEN, et al.)
Defendants,)

UNITED STATES OF AMERICA,)
Amicus Curiae.)

IN RE: JUVENILE FACILITIES)

Civ. No. CH 97-MS-001-B

IN RE: TALLULAH CORRECTIONAL)
CENTER FOR YOUTH)

Civ. No. CH 97-0665-B-M1

IN RE: JETSON CORRECTIONAL)
CENTER FOR YOUTH)

Civ. No. CH 97-0666-B-M1

IN RE: SWANSON CORRECTIONAL)
CENTER FOR YOUTH)

Civ. No. CH 97-0667-B-M1

IN RE: LOUISIANA TRAINING)
INSTITUTE - BRIDGE CITY))

Civ. No. CH 97-0668-B-M1

IN RE: JENA JUVENILE JUSTICE)
CENTER)

Civ. No. CH 98-0804-B-M1

BRIAN B., et al.)
Plaintiffs,)

Civ. No. 98-886-B-M1

v.)

RICHARD STALDER, et al.,)
Defendants.)

INITIALS	DOCKET#
<i>Adg</i>	<i>203</i>

JB

THE UNITED STATES OF AMERICA,)	Civ. No. 98-947-B-1✓
Plaintiff,)	
)	
v.)	
)	
THE STATE OF LOUISIANA,)	
<u>et al.</u> ,)	
Defendants.)	
_____)	
)	
A.A., <u>et al.</u> ,)	
Plaintiffs,)	Civ. No. 00-246-C-M1
)	
v.)	
)	
WACKENHUT CORRECTIONS CORP.,)	
<u>et al.</u> ,)	
Defendants.)	
_____)	

**JOINT MOTION FOR DISMISSAL OF MEDICAL CLAIMS
AT ALL FACILITIES AND FOR DISMISSAL OF ALL CLAIMS
PERTAINING TO SCCY-MADISON AND BCCCY**

NOW INTO COURT, through undersigned counsel, come the State of Louisiana (the “State”), the United States Department of Justice (the “DOJ”), and private plaintiffs in these consolidated actions who state as follows:

1. The parties have entered a private settlement agreement (the 2004 Settlement) that has incorporated certain obligations from previous settlement agreements.
2. As part of the 2004 Settlement, the State and the DOJ have agreed to continue the services of James Austin, a recognized expert in juvenile corrections, to assist and work with the State to implement the new agreement and to submit periodic reports on the State’s compliance with the agreement.

3. The 2004 Settlement Agreement has been executed and is effective between the State and the DOJ. The 2004 Settlement Agreement will be effective between the State and private plaintiffs if (1) the Court provides preliminary approval of the 2004 Settlement Agreement for purposes of providing notice to the class under Rule 23 of the Federal Rules of Civil Procedure; (2) the Court approves the notice to the class members and schedules a hearing to consider comments from the class members (if necessary) under Rule 23 of the Federal Rules of Civil Procedure, and (3) the Court provides final approval of the 2004 Settlement Agreement. The proposed order contains language regarding notice to the class members and a proposed date and time for a hearing to receive comments from members of the class.

WHEREFORE, the parties move the Court to dismiss, with prejudice, all claims in these actions relating to medical services at Louisiana's secure juvenile facilities;

The parties further move the Court to dismiss, with prejudice, all claims in these actions pertaining to Swanson Correctional Center for Youth - Madison Parish Unit and Bridge City Correctional Center for Youth, except to the extent provided in paragraph 6(C) of the 2004 Settlement Agreement.

The private plaintiffs and State further move the Court to provide preliminary approval of the 2004 Settlement Agreement for purposes of providing notice to the class under Rule 23 of the Federal Rules of Civil Procedure; and

The private plaintiffs and State further move the Court to approve the notice to class members and schedule a hearing to receive comments from members of the class.

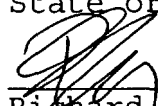
In all other respects, the parties stipulate and agree that these actions should remain administratively closed.

This Joint Motion to Dismiss is entered on this 31st day of January, 2004.

FOR DEFENDANTS

FOR THE STATE OF LOUISIANA AND
ITS OFFICES, AGENCIES, AND
DEPARTMENTS

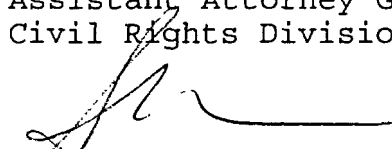
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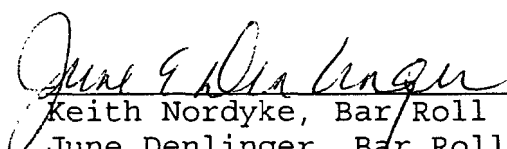
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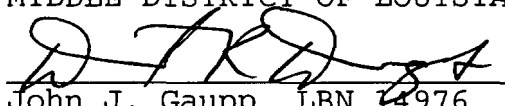
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