

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

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

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SIGN *[Signature]*
RICHARD T. MARTIN

Civil No. CH 97-0665-B-MI

98 947

IN RE: TALLULAH CORRECTIONAL CENTER
FOR YOUTH

BRIAN B., et al.

Plaintiffs,

v.

RICHARD STALDER, et al.

Defendants.

Civil No.

98-886-B-MI

ANSWER TO COMPLAINT

NOW INTO COURT, through undersigned counsel, come Defendants, The City of Tallulah and Theodore Lindsay, in his official capacity as the Mayor of the City of Tallulah, who, in Answer to the Complaint filed by Plaintiffs, Barry A., Brian B., Christopher C., Jason E., Jacob F., Jordan G., Jimmy H., Larry J., and Vince M., by and through their Guardian Ad Litem, Shannon Robshaw; Preston K., Stephen L., and Walter N., on behalf of themselves and others similarly situated, deny each and every allegation contained herein unless expressly admitted herein below, and who, in further answer, respectfully responds as follows:

INTRODUCTION

- I. The allegations contained in Paragraph 1 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- II. The allegations contained in Paragraph 2 of Plaintiffs' Complaint are denied.
- III. The allegations contained in Paragraph 3 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.



1. JURISDICTION

- IV. The allegations contained in Paragraph 4 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- V. The allegations contained in Paragraph 5 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- VI. The allegations contained in Paragraph 6 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

2. VENUE

- VII. The allegations contained in Paragraph 7 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

3. PARTIES

PLAINTIFFS

- VIII. The allegations contained in Paragraph 8 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- IX. The allegations contained in Paragraph 9 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- X. The allegations contained in Paragraph 10 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XI. The allegations contained in Paragraph 11 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XII. The allegations contained in Paragraph 12 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XIII. The allegations contained in Paragraph 13 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XIV. The allegations contained in Paragraph 14 of Plaintiffs' Complaint are denied for lack of

sufficient information to justify a belief therein.

- XV. The allegations contained in Paragraph 15 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XVI. The allegations contained in Paragraph 16 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XVII. The allegations contained in Paragraph 17 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XVIII. The allegations contained in Paragraph 18 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XIX. The allegations contained in Paragraph 19 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

DEFENDANTS

- XX. The allegations contained in Paragraph 20 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXI. The allegations contained in Paragraph 21 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXII. The allegations contained in Paragraph 22 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXIII. The allegations contained in Paragraph 23 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXIV. The allegations contained in Paragraph 24 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXV. The allegations contained in Paragraph 25 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXVI. The allegations contained in Paragraph 26 of Plaintiffs' Complaint are denied for lack of

sufficient information to justify a belief therein.

- XXVII. The allegations contained in Paragraph 27 of Plaintiffs' Complaint are denied as written.
- XXVIII. The allegations contained in Paragraph 28 of Plaintiffs' Complaint are denied as written.
- XXIX. The allegations contained in Paragraph 29 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXX. The allegations contained in Paragraph 30 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXI. The allegations contained in Paragraph 31 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXII. The allegations contained in Paragraph 32 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXIII. The allegations contained in Paragraph 33 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXIV. The allegations contained in Paragraph 34 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXV. The allegations contained in Paragraph 35 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXVI. The allegations contained in Paragraph 36 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXVII. The allegations contained in Paragraph 37 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XXXVIII. The allegations contained in Paragraph 38 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

- XXXIX. The allegations contained in Paragraph 39 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XL. The allegations contained in Paragraph 40 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLI. The allegations contained in Paragraph 41 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLII. The allegations contained in Paragraph 42 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLIII. The allegations contained in Paragraph 43 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLIV. The allegations contained in Paragraph 44 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLV. The allegations contained in Paragraph 45 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLVI. The allegations contained in Paragraph 46 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLVII. The allegations contained in Paragraph 47 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- XLVIII. The allegations contained in Paragraph 48 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

4. CLASS ACTION ALLEGATIONS

- XLIX. The allegations contained in Paragraph 49 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- L. The allegations contained in Paragraph 50 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

- LI. The allegations contained in Paragraph 51 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LII. The allegations contained in Paragraph 52 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LIII. The allegations contained in Paragraph 53 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LIV. The allegations contained in Paragraph 54 of Plaintiffs' Complaint are denied.

5. GENERAL ALLEGATIONS REGARDING TCCY

Physical Plant and Employees

- LIV. The allegations contained in Paragraph 55 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LVI. The allegations contained in Paragraph 56 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LVII. The allegations contained in Paragraph 57 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LVIII. The allegations contained in Paragraph 58 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

TCCY's Population

- LIX. The allegations contained in Paragraph 59 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LX. The allegations contained in Paragraph 60 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- LXI. The allegations contained in Paragraph 61 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXII. The allegations contained in Paragraph 62 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXIII. The allegations contained in Paragraph 63 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXIV. The allegations contained in Paragraph 64 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXV. The allegations contained in Paragraph 65 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

INADEQUATE STAFFING LEVELS AND INADEQUATE TRAINING AND SUPERVISION OF STAFF

LXVI. The allegations contained in Paragraph 66 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXVII. The allegations contained in Paragraph 67 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXVIII. The allegations contained in Paragraph 68 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Malicious and Sadistic Use of Force by Staff

LXIX. The allegations contained in Paragraph 69 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXX. The allegations contained in Paragraph 70 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXI. The allegations contained in Paragraph 71 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXII. The allegations contained in Paragraph 72 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXIII. The allegations contained in Paragraph 73 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXIV. The allegations contained in Paragraph 74 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXV. The allegations contained in Paragraph 75 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXVI. The allegations contained in Paragraph 76 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Excessive Use of Force

LXXVII. The allegations contained in Paragraph 77 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXVIII. The allegations contained in Paragraph 78 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXIX. The allegations contained in Paragraph 79 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXX. The allegations contained in Paragraph 80 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Failure to Protect Against Youth-on-Youth Violence

LXXXI. The allegations contained in Paragraph 81 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXXII. The allegations contained in Paragraph 82 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXXIII. The allegations contained in Paragraph 83 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Contraband

LXXXIV. The allegations contained in Paragraph 84 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Sexual Abuse

LXXXV. The allegations contained in Paragraph 85 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Inadequate Investigation & Reporting

LXXXVI. The allegations contained in Paragraph 86, including subparts a through c, of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXXVII. The allegations contained in Paragraph 87, including subparts a through c, of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

LXXXVIII. The allegations contained in Paragraph 88 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

ARBITRARY DISCIPLINARY PROCEDURES AND IMPROPER USE OF ISOLATION

Arbitrary Disciplinary Procedures

LXXXIX. The allegations contained in Paragraph 89 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XC. The allegations contained in Paragraph 90 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCI. The allegations contained in Paragraph 91 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCII. The allegations contained in Paragraph 92 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCIII. The allegations contained in Paragraph 93 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCIV. The allegations contained in Paragraph 94 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Improper Use of Isolation

XCV. The allegations contained in Paragraph 95 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCVI. The allegations contained in Paragraph 96, including subparts a through f, of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCVII. The allegations contained in Paragraph 97 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCVIII. The allegations contained in Paragraph 98 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

XCIX. The allegations contained in Paragraph 99 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

C. The allegations contained in Paragraph 100 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

FAILURE TO PROVIDE MENTAL HEALTH CARE

CI. The allegations contained in Paragraph 101 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CII. The allegations contained in Paragraph 102 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CIII. The allegations contained in Paragraph 103 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

- CIV. The allegations contained in Paragraph 104 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CV. The allegations contained in Paragraph 105 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CVI. The allegations contained in Paragraph 106 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CVII. The allegations contained in Paragraph 107 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CVIII. The allegations contained in Paragraph 108 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CIX. The allegations contained in Paragraph 109 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CX. The allegations contained in Paragraph 110 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CXI. The allegations contained in Paragraph 111 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CXII. The allegations contained in Paragraph 112 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CXIII. The allegations contained in Paragraph 113 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CXIV. The allegations contained in Paragraph 114 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

INADEQUATE MEDICAL CARE

- CXV. The allegations contained in Paragraph 115 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXVI. The allegations contained in Paragraph 116 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXVII. The allegations contained in Paragraph 117 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXVIII. The allegations contained in Paragraph 118 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXIX. The allegations contained in Paragraph 119 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXX. The allegations contained in Paragraph 120 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXI. The allegations contained in Paragraph 121 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXII. The allegations contained in Paragraph 122 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXIII. The allegations contained in Paragraph 123 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXIV. The allegations contained in Paragraph 124 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXV. The allegations contained in Paragraph 125 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

INADEQUATE NUTRITION

CXXVI. The allegations contained in Paragraph 126 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXVII. The allegations contained in Paragraph 127 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXVIII. The allegations contained in Paragraph 128 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CONDITIONS OF CONFINEMENT DEFICIENCIES

CXXIX. The allegations contained in Paragraph 129 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXX. The allegations contained in Paragraph 130 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXXI. The allegations contained in Paragraph 131 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXXII. The allegations contained in Paragraph 132 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXXIII. The allegations contained in Paragraph 133 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXXIV. The allegations contained in Paragraph 134 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXXV. The allegations contained in Paragraph 135 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXXVI. The allegations contained in Paragraph 136 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CXXXVII. The allegations contained in Paragraph 137 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

REGULAR EDUCATION INADEQUACIES

CXXXVIII. The allegations contained in Paragraph 138 of Plaintiffs' Complaint are denied.

CXXXIX. The allegations contained in Paragraph 139 of Plaintiffs' Complaint are denied as written.

- CXL. The allegations contained in Paragraph 140 of Plaintiffs' Complaint are denied.
- CXLI. The allegations contained in Paragraph 141 do not pertain to these Defendants; however, out of an abundance of caution, the allegations contained in Paragraph 141 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CXLII. The allegations contained in Paragraph 142 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CXLIII. The allegations contained in Paragraph 143 of Plaintiffs' Complaint are denied.
- CXLIV. The allegations contained in Paragraph 144 of Plaintiffs' Complaint are denied.
- CXLV. The allegations contained in Paragraph 145 of Plaintiffs' Complaint are denied.
- CXLVI. The allegations contained in Paragraph 146 of Plaintiffs' Complaint are denied as written.
- CXLVII. The allegations contained in Paragraph 147 of Plaintiffs' Complaint are denied as written.
- CXLVIII. The allegations contained in Paragraph 148 of Plaintiffs' Complaint are denied.
- CXLIX. The allegations contained in Paragraph 149 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CL. The allegations contained in Paragraph 150 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

SPECIAL EDUCATION INADEQUACIES

- CLI. The allegations contained in Paragraph 151 of Plaintiffs' Complaint are denied.
- CLII. The allegations contained in Paragraph 152 of Plaintiffs' Complaint are denied.
- CLIII. The allegations contained in Paragraph 153 of Plaintiffs' Complaint are denied as written.
- CLIV. The allegations contained in Paragraph 154 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

- CLV. The allegations contained in Paragraph 155 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLVI. The allegations contained in Paragraph 156 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLVII. The allegations contained in Paragraph 157 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLVIII. The allegations contained in Paragraph 158 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLIX. The allegations contained in Paragraph 159 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLX. The allegations contained in Paragraph 160 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLXI. The allegations contained in Paragraph 161 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

REHABILITATION PROGRAMMING INADEQUACIES

- CLXII. The allegations contained in Paragraph 162, including subparts a through f, of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLXIII. The allegations contained in Paragraph 163 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.
- CLXIV. The allegations contained in Paragraph 164 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

FAMILY UNIFICATION & COMMUNITY REINTEGRATION

- CLXV. The allegations contained in Paragraph 165 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXVI. The allegations contained in Paragraph 166 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXVII. The allegations contained in Paragraph 167 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXVIII. The allegations contained in Paragraph 168 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

ACCESS TO COURTS

CLXIX. The allegations contained in Paragraph 169 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXX. The allegations contained in Paragraph 170 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXI. The allegations contained in Paragraph 171 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXII. The allegations contained in Paragraph 172 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXIII. The allegations contained in Paragraph 173 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXIV. The allegations contained in Paragraph 174 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXV. The allegations contained in Paragraph 175 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXVI. The allegations contained in Paragraph 176 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXVII. The allegations contained in Paragraph 177 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

CLXXVIII. The allegations contained in Paragraph 178 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

NECESSITY FOR INJUNCTIVE RELIEF; NO ADEQUATE REMEDY AT LAW

CLXXIX. The allegations contained in Paragraph 179 of Plaintiffs' Complaint are denied as these allegations pertain to your Defendants herein.

KNOWLEDGE OF THE DEFENDANTS

CLXXX. The allegations contained in Paragraph 180 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

6. CAUSES OF ACTION

CLXXXI. The allegations contained in Paragraph 181 of Plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

Count I

CLXXXII. The allegations contained in Paragraph 182 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count II

CLXXXIII. The allegations contained in Paragraph 183 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count III

CLXXXIV. The allegations contained in Paragraph 184 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count IV

CLXXXV. The allegations contained in Paragraph 185 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

CLXXXVI. The allegations contained in Paragraph 186 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count V

CLXXXVII. The allegations contained in Paragraph 187 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count VI

CLXXXVIII. The allegations contained in Paragraph 188 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count VII

CLXXXIX. The allegations contained in Paragraph 189 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count VIII

CXC. The allegations contained in Paragraph 190 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

Count IX

CXCI. The allegations contained in Paragraph 191 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

CXCII. The allegations contained in Paragraph 192 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

State Pendant Claims

CXCIII. The allegations contained in Paragraph 193 of Plaintiffs' Complaint are denied as these allegations pertain to your defendants herein.

AND NOW FURTHER ANSWERING, Defendants further aver as follows:

CXCIV. Plaintiffs' Complaint fails to state a claim upon which relief can be granted as to defendants appearing herein.

WHEREFORE, Defendants, The City of Tallulah and Theodore Lindsay, in his official capacity as the Mayor of The City of Tallulah, pray that the above and foregoing Answer to Complaint be deemed good and sufficient, and that after legal delays and due proceedings had, there be Judgment herein in favor of Defendants, The City of Tallulah and Theodore Lindsay, in his official capacity as the Mayor of The City of Tallulah, and against Plaintiffs, Barry A., Brian B., Christopher C., Jason E., Jacob F., Jordan G., Jimmy H., Larry J., and Vince M., by and through their Guardian Ad Litem, Shannon Robshaw; Preston K., Stephen L., and Walter N., on behalf of themselves and others similarly situated, dismissing Plaintiffs' suit at their sole cost and for all costs of these proceedings, to which Defendants may show themselves justly entitled, or alternatively, to such relief to which Defendants are entitled in law or in equity.

Respectfully submitted,

BOLES, BOLES & RYAN

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By: Michael L. Dubos
MICHAEL L. DUBOS (23944)

ATTORNEYS FOR DEFENDANTS, THE CITY OF
TALLULAH AND THEODORE LINDSAY, IN HIS
OFFICIAL CAPACITY AS THE MAYOR OF THE
CITY OF TALLULAH

CERTIFICATE

I do hereby certify that a copy of the above and foregoing has been forwarded to all counsel of record this day, via U.S. Mail, postage prepaid.

Monroe, Louisiana, this 26TH day of February, 1998.

Michael L. Dubos
OF COUNSEL