

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

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF LOUISIANA - 1 PM 2:32

HAYES WILLIAMS, et al,)
)
 Plaintiffs,)
)
 v.)
)
 JOHN McKEITHEN, et al,)
)
 Defendants,)
)
 UNITED STATES OF AMERICA,)
)
 Amicus Curiae.)
)
 IN RE: JUVENILE FACILITIES)
)
 IN RE: TALLULAH CORRECTIONAL)
 CENTER FOR YOUTH)
)
 IN RE: JETSON CORRECTIONAL)
 CENTER FOR YOUTH)
)
 IN RE: SWANSON CORRECTIONAL)
 CENTER FOR YOUTH)
)
 IN RE: LOUISIANA TRAINING)
 INSTITUTE - BRIDGE CITY)
)
 _____)
 BRIAN B., et al.,)
 Plaintiffs.)
)
 v.)
)
 RICHARD STALDER, et al.,)
 Defendants.)
)
 _____)
 THE UNITED STATES OF AMERICA,)
 Plaintiffs)
)
 v.)
)
 THE STATE OF LOUISIANA, et al.,)
 Defendants.)
)
 _____)

Civil No. ~~2098-B~~
by DEPUTY CLERK

Civil No. CH 97-MS-001-B

Civil No. CH 97-0665-B-M1

Civil No. CH 97-0666-B-M1

Civil No. CH 97-0667-B-M1

Civil No. CH 97-0668-B-M1

Civil No. 98-886-B-M1

Civil No. 98-947-B-1

MEMORANDUM IN SUPPORT OF
JOINT MOTION TO FILE EDUCATION SETTLEMENT AGREEMENT,
REQUEST A STAY OF EDUCATION LITIGATION, AND SET A HEARING DATE



3:97-ms-00001 284 - 1

The parties to the above-captioned litigation have resolved litigation concerning the educational services in the State of Louisiana's secure juvenile training facilities. This litigation has arisen from three sources: the long-standing consent decrees in Williams v. McKeithen, Civ. No. 71-98 (M.D. La.); a private lawsuit concerning conditions at the Tallulah Correctional Center for Youth entitled Brian B. v. Stalder, Civ. No. 98-0886-B-1; and a lawsuit filed by the United States Department of Justice concerning conditions in four of the State's post-adjudication secure juvenile facilities, United States v. Louisiana, Civ. No. 98-0947-B-1. The parties wish to file this agreement with the Court.

As required by Paragraph 68 of the agreement, the parties request that the Court stay further proceedings in United States v. Louisiana, Brian B. v. Stalder, Williams v. McKeithen, and all related In re: actions, relating to the provision of educational services.

As required by Paragraph 71 of the agreement, the parties also request that the Court schedule a hearing to be held seven months from the date of execution of the agreement. As described more fully in Paragraphs 72 and 73 of the agreement, the purpose of the hearing will be for the Court to determine whether the education claims in United States v. Louisiana, Brian B. v. Stalder, Williams v. McKeithen, and all related In re: actions shall be conditionally dismissed or whether the stay of the education litigation shall be withdrawn.

Respectfully submitted,

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

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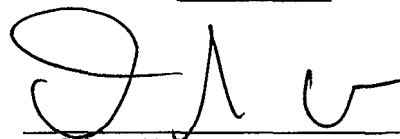
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