

For the reasons set forth herein and in the accompanying Memorandum in Support of the Motion for Class certification, Plaintiffs request that the Court enter an Order providing that this action shall be maintained as a class action.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of July 2012, I electronically filed the foregoing with the Clerk of court by using the CM/ECF system. A copy of this document as well as a notice of electronic filing has been personally served on all non-CM/ECF participant Defendants:

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I. INTRODUCTION

This is a civil action brought under, inter alia, 42 U.S.C. § 1983 challenging the violation of civil and constitutional rights of children, who are now or in the future will be in Louisiana Office of Juvenile Justice secure custody. The children confined at Bridge City Center for Youth (BCCY), Jetson Center for Youth (JCY), Swanson Center for Youth (SCY), and youth in Office of Juvenile Justice (OJJ) custody but housed at various contract secure facilities around the state are being denied meaningful access to counsel and the courts. This action addresses violations of Plaintiffs’ rights under the First and Fourteenth Amendments to the United States Constitution, the Louisiana Children’s Code, and other applicable federal and state laws.

Plaintiffs request that the Court certify this proceeding as a class action pursuant to Rule 23(a) and Rule 23(b)(2) of the Federal Rules of Civil Procedure. For the purposes of declaratory and injunctive relief as to all the claims made in this action, Plaintiffs request certification of a class of all children who are now, or in the future will be subject to Office of Juvenile Justice custody and secure confinement. For the reasons set forth herein, Plaintiffs respectfully request the Court to grant class certification as the requirements of Fed. R. Civ. P. 23 and Local Rule 23.1 have been satisfied.

II. Proposed Class Definition

The proposed class consists of all children who are currently, or in the future will be incarcerated at a state run or contract confinement facility under the statutory care, custody, and control of the State of Louisiana Office of Juvenile Justice pursuant the Louisiana Children's Code. Class action suits have been a traditional vehicle for challenging system-wide violations in prisons, jails, and detention facilities. Jones v. Diamond, 519 F.2d 1090 (5th Cir. 1975). Federal courts in this and other judicial circuits have routinely authorized such cases to proceed as class actions on behalf of all prisoners confined in the challenged institutions. See Monmouth County Correctional Inst. Inmates v. Lanzaro, 834 F.2d 326, 328 (3d Cir. 1987); French v. Owens, 777 F.2d 1250, 1251 (7th Cir. 1985); Union County Jail Inmates v. Di Buono, 713 F.2d 984 (3rd Cir. 1983); Ramos v. Lamm, 639 F.2d 559 (10th Cir 1980); Campbell v. McGruder, 580 F.2d 521 (U.S. App. D.C. 1978); Finney v. Arkansas Bd. of Correction, 505 F.2d 194 (8th Cir. 1974); Martin v. Hadix, 527 U.S. 343 (1999); Lewis v. Casey, 518 U.S. 343 (1996); Castillo v. Cameron County, 238 F.3d 339 (5th Cir. 2001); Gates v. Cook, 234 F.3d 221 (5th Cir. 2000); Logory v. County of Susquehanna, 277 F.R.D. 135 (M.D. Pa. 2011).

III. THE PROPOSED CLASS SHOULD BE CERTIFIED BECAUSE THE REQUIREMENTS OF FED. R. CIV. P.23 ARE SATISFIED

A class should be certified under Fed. R. Civ. P. 23(a) when the class is (1) so numerous that joinder of all members is impracticable, (2) there are questions, of law or fact common to the class, (3) the claims or defenses of the representative parties are typical of the claims or defenses of the class, and (4) the representative parties will fairly and adequately protect the interests of the class. Plaintiffs seeking class certification must satisfy Rule 23(a)'s four threshold requirements, as well as the requirements of Rule 23(b)(1), (2), or (3). M.D. ex rel. Stukenberg v. Perry, 675 F.3d 832, 837 (5th Cir. March 23, 2012). When conducting the analysis of the Rule

23 requirements, before certifying a class, courts must “look beyond the pleadings to understand the claims, defenses, relevant facts, and applicable substantive law in order to make a meaningful determination of the certification issues.” Id. 675 at 838 citing McManus v Fleetwood Enters., Inc., 320 F.3d 545, 548 (5th Cir. 2003).

A. The Proposed Class Meets the Requirements of Rule 23(a)

1. Numerosity

Rule 23(a)(1) allows a class action to be maintained if the class is so numerous that joinder of all members is impracticable. Fed. R. Civ. P. 23(a)(1). The size of the proposed class and the inclusion of future members are factors that make joinder impracticable. Pederson v. Louisiana State Univ., 213 F.3d 858 (5th Cir. 2000). The 5th Circuit has held that a “sufficiently large number of potential claimants alone may indicate that the numerosity requirement is met.” Mullen v. Treasure Chest Casino, 186 F.3d 620 (5th Cir. 1999). Courts in the 5th Circuit have not required evidence of exact class size or identity of class members to satisfy the numerosity requirement, and there is no set number above or below which a class is considered to have or have not satisfied the numerosity requirement. Id.

In addition to considering the number of people in a proposed class, courts also look at the impracticability of joining all the plaintiffs. Impracticability of joinder is correlated to the number of class members in that the larger the number of potential claimants, the greater the impracticability of joinder. In Jack v. American Linen Supply Co., 498 F.2d 122, 124 (5th Cir. 1974), where the proposed class included “unnamed, unknown future” members, the Court noted that “joinder of unknown individuals is certainly impracticable” and weighs in favor of certification. See also Pederson, 213 F.3d at 869 (inclusion of future class members is relevant to whether joinder is impracticable). Courts have often found that, regardless of the current size of

the class, in cases involving prisons and jails, the numerosity requirement is satisfied because joining future members is impracticable. Andre H. v. Amback, 104 F.R.D. 606, 611 (S.D.N.Y. 1985); Skinner v. Uphoff, 209 F.R.D. 484,488 (D. Wyo. 2002); Holland v. Steele, 92 F.R.D. 58, 63 (N.D. Ga. 1981).

The proposed class consists of children between the ages of 10-21 who are now, or in the future will be statutorily placed in the care, custody, and control of the Louisiana Office of Juvenile Justice and placed inside of a Louisiana operated secure care facility or a secure care facility contracting with the Office of Juvenile Justice. This population of youth is a transient group because youth are frequently being admitted and/or released into these facilities based on the judgment of various judges around the state with juvenile jurisdiction. On any given day, the Office of Juvenile Justice houses between 400-500 youth in secure custody, housed at various secure facilities around the state including Bridge City Center for Youth, Jetson Center for Youth, and Swanson Center for Youth. Approximately 800-1200 youth are admitted and/or released from OJJ secure custody in any calendar year.

In the current case, the class as defined would include present and future children placed in Office of Juvenile Justice secure custody. As stated, this population is transient and is constantly revolving based on youth satisfying their delinquency disposition or other youth being adjudicated delinquent and place in secure custody. The nature of this population makes joinder impractical. Individual litigation would impose a substantial burden on Plaintiffs, Defendants, and the courts.

2. Commonality

Rule 23(a)(2) allows a class action to be maintained if there are questions of law or fact common to the class. Fed. R. Civ. P. 23(a)(2). In order to meet this requirement under Rule

23(a)(2), the proposed class must prove that the claims of every class member “depend upon a common contention that is capable of class wide resolution,” which means that the contention is “of such a nature... that determination of its truth or falsity will resolve an issue that is central to the validity of each one of the claims in one stroke.” Wal-Mart Stores, Inc. v. Dukes, 131 S.Ct. 2541, 2551 (2011). “What matters to class certification...is not the raising of common ‘questions’...but rather the capacity of a class-wide proceeding to generate common answers.” Id. Even a single common question is sufficient for purposes of Rule 23(a)(2). Id. at 2556.

The Plaintiffs in this case allege that Defendants’ practice and policy of denying meaningful access to courts and counsel causes all class members irreparable harm as a result of the violation of their 1st and 14th amendment rights but also puts them at risk of further losing their liberties within the facilities without the ability to protect their rights. Defendants have neglected their responsibility, as outlined in the Louisiana Children’s Code, as sole custodian of Plaintiffs, which is to provide them with meaningful access to courts and counsel. Each member of the Plaintiff class is effectively barred from access to counsel and the courts. A class-wide proceeding would generate a common answer to Plaintiffs’ allegations, as the *Wal-Mart* court requires.

Most recently, the U.S. 5th Circuit Court of Appeals addressed a case and interpreted the requirements of the Wal-Mart opinion. M.D. ex rel. Stukenberg v. Perry, 675 F.3d 832 (5th Circuit 2012). The 5th Circuit found that “members of a proposed class do not establish that their claims can productively be litigated at once, merely by alleging a violation of the same legal provision by the same defendant.” Id. at 840. In M.D., The court found that each class member’s claims required individualized determinations of various issues of law and fact. Id. The 5th Circuit criticized the district court because it did not “indicate how the resolution of the

alleged common question of fact would decide an issue that is central to the substantive due process claims... of every class member at the same time.” Id. at 841. (Plaintiffs alleged various allegations of systemic deficiencies in the State’s administration of Texas’ long-term foster care system).

In the present case, the inquiry does not require individual determinations. Each member of the proposed Plaintiff class is exposed to the centralized administrative policies or lack thereof, of OJJ while detained in OJJ operated secure care facilities and contracted facilities throughout the state. The proposed Plaintiff class does not claim that “general systemic deficiencies result in widespread violations of their statutory and constitutional rights”, a contention that the 5th Circuit found too general. See Id. at 842. Rather, the proposed Plaintiff class alleges that Defendants engage in practices that actively and daily impede their access to counsel. This violation applies to each named and putative plaintiff equally. Additionally, Defendants lack any resemblance of a policy or procedure to provide adequate, meaningful, and effective access to courts and counsel. Each manifestation of this policy, or absence of a policy, is not unique to one facility, but Plaintiffs experience legal violations as a result of these practices in each OJJ operated facility and contract facility. Resolution of Plaintiffs contentions regarding Defendants’ behavior would decide an issue central to the claims of every class member at the same time, namely that Plaintiffs are denied meaningful access to counsel.

One solution provides a class-wide answer. The relief sought here, declaratory judgment and injunctive relief, would compel Defendants to actively provide, not blatantly bar, Plaintiffs’ meaningful access to counsel. Resolving these specific allegations would “resolve an issue that is central to the validity of each of the individuals’ claims in one stroke.” Wal-Mart, 131 U.S. at 2551. The common contentions listed above are more than sufficient to satisfy Rule 23(a)(2).

3. Typicality

Rule 23(a)(3) allows a class action to be maintained if the claims or defenses of the representative parties are typical of the claims or defenses of the class. Fed. R. Civ. P. 23(a)(3). Because the policies and practices challenged apply with equal force to the named Plaintiffs and other members of the class, the claims of the named Plaintiffs are typical of the class in general. Fed. R. Civ. P. 23(a)(3). The test for typicality is not that the claims of the named individuals be identical to the claims of the other class members, but that the class representatives must “possess the same interest and suffer the same injury” as other class members. Gen. Tel. Co. of Sw. v. Falcon, 457 U.S. 147, 156 (1982). Claims of both named and unnamed class members must arise from the same event, practice or course of conduct and are based on the same legal theory, despite factual distinctions between claims of the named plaintiffs and other class members. Shaw v. Toshiba America Information Systems, 91 F. Supp. 2d 942, 955 (E.D. Tex. 2000).

Here, the legal theories advanced and relief sought by the named Plaintiffs and putative class members are the same. Constitutional violations stem from Plaintiffs’ lack of meaningful access to counsel while housed in OJJ operated or contracted facilities. Further, there are no fundamental factual differences between the circumstances of the named plaintiffs and other putative class members.

The proposed class in the instant case may be distinguished from the putative class in M.D. where the court found that Rule 23(a)’s typicality requirement was not satisfied because the alleged harms suffered by the Named Plaintiffs were not experienced by a majority of the purported class. M.D., 675 F3d at 838. Here, all youth detained in OJJ operated or contracted facilities are subject to the same policies and structural barriers to accessing counsel and the

courts. If class certification is denied, every individual youth in current or future OJJ custody would be forced to vindicate his or her rights in an individual lawsuit addressing the same violations challenged in this lawsuit.

4. Adequacy of Representation

The final requirement of Rule 23(a) is that the representative parties fairly and adequately protect the interests of the class. Fed. R. Civ. P. 23(a)(4). For the adequacy requirement to be met, there must be no significant conflict of interests between the named plaintiffs and the absent class members. Mullen, 186 F.3d at 625-36. In Amchem Products Inc. v. Windsor, 521 U.S. 591 (1997), the Supreme Court articulated that the adequacy-of-representation requirement “tends to merge” with Rule 23(a)’s commonality and typicality criteria, which work in conjunction to ensure that maintenance of a class action is economical and “whether the named plaintiffs’ claims and the class claims are so interrelated that the interests of the class members will be fairly and adequately protected in their absence.” Amchem 521 U.S. at 625.

Additionally, the future release from OJJ custody does not make any of the named plaintiffs inadequate class representatives. Prospective future release does not constitute grounds for denying class certification; the prospect of release actually supports class certification. Stewart v. Winter, 669 F. 2d 328, 334 (5th Cir. 1982). Specifically for prison litigation, class certification ensures the presence of a continuing class of plaintiffs with a live dispute against prison authorities. Id. citing United States Parole Comm’n v. Geraghty, 445 U.S. 388, 397 (1980); See also Cruz v. Hauck, 627 F.2d 710, 716-717 (5th Cir. 1980)(it was an error to deny certification on grounds that plaintiffs were no longer incarcerated in jail).

Here, the Named Plaintiffs will fairly and adequately represent the interests of the class. They have the same claims and seek the same remedies as the class as a whole. Each named

Plaintiff has suffered the same or similar harm as the members of the class, and each named Plaintiff has the same interest in vindication of his or her rights as members of the class.

Additionally, there exists no conflict of interest between the named Plaintiffs and the other class members because they all advance the same legal theories and they all pursue the same legal relief. The named Plaintiffs possess a strong personal interest in the subject matter of the lawsuit, and are represented by experienced counsel with particular expertise with class action litigation in federal court. Counsel has the legal knowledge and the resources to fairly and adequately represent the interests of all the class members in this action.

B. The Proposed Class Meets the Requirements of Rule 23(b)(2)

Along with meeting all of the requirements of Rule 23(a), Plaintiffs must meet one of the three requirements of Rule 23(b). Here, Plaintiffs meet the requirements of Rule 23(b)(2). Defendants' actions have been taken "on grounds generally applicable to the class, thereby making appropriate final injunctive or corresponding declaratory relief with respect to the class as a whole." Fed. R. Civ. P. 23(b)(2). Courts have recognized that class actions certified under Rule 23(b)(2) are particularly important in civil rights cases where injunctive relief is sought, as in the present case. Jones v. Diamond, 519 F.2d 1090, 1099 (5th Cir. 1975). Rule 23(b)(2) class actions are particularly common and appropriate in prison and jail lawsuits where the issues involved are applicable in the same manner to each member of the class. Specifically, whether a class may be certified under 23(b)(2) depends on whether class members seek uniform relief from a practice applicable to all of them. Rodriguez v. Hayes, 591 F3d 1105 (9th Cir. 2008).

Here, Defendants' refusal or failure to act equally affects rights common to all of the class members, both the named Plaintiffs and the unnamed class members. Defendants are acting or refusing to act in a manner that is generally applicable to the entire class of Plaintiffs. Final

injunctive and declaratory relief is appropriate because it will resolve the challenge to Defendants' action and inactions for the class as a whole. The policies and practices at issue are not the result of actions, policies, or practices aimed solely at the named Plaintiffs or other specific detained children. These policies and practices, or lack thereof, have general application to the class of children as a whole.

The proposed class is distinguished from the class in Wal-Mart, where the Court concluded that Rule 23(b)(2) applies only when a single injunction or declaratory judgment would provide relief to each member of the class. Walmart, 131 U.S. at 2557. (The Court did not authorize class certification when each individual class member would be entitled to a different injunction or declaratory judgment against the defendant. "The key to the 23(b)(2) class is the individual nature of the injunctive or declaratory remedy warranted the notion that the conduct is such that it can be enjoined or declared unlawful only as to all of the class members or as to none of them." Id. Here, Plaintiffs do not seek different injunction or declaratory judgments against Defendants. Plaintiffs request a single declaratory judgment that Defendants' current policy with respect to attorney visitation, legal mail, and access to courts violates Plaintiffs' constitutional rights to adequate, meaningful, and effective access to the courts. Plaintiffs request a single permanent injunction requiring the Defendants, their agents, employees, and all persons acting in concert with them to allow youth to meet with counsel of their choice.

Plaintiffs' request for class certification under Rule 23(b)(2) is necessary to ensure that any mandatory relief will extend not merely to one named individual, but the entire class of children who are currently or will in the future be detained by OJJ. Therefore, injunctive and declaratory relief with respect to the class as a whole is appropriate.

C. The Proposed Class Counsel Satisfy the Requirements of Fed. R. Civ. P. 23(g) so the Court should designate Plaintiff's Counsel as class counsel.

Federal Rule 23(g) requires that the district court appoint class counsel for any class that is certified. Fed. R. Civ. P. 23(g)(1). The appointed class counsel must be listed in the Court's class certification order. Fed. R. Civ. P. 23(c)(1)(B). The Rule identifies four factors that the Court must consider in appointing class counsel: (1) "the work counsel has done in identifying or investigating potential claims in the action;" (2) "counsel's experience in handling class actions, other complex litigation, and the types of claims asserted in the action;" (3) "counsel's knowledge of the applicable law;" and (4) "the resources that counsel will commit to representing the class." Fed. R. Civ. P. 23(g)(1)(A). The Law Offices of John S. Williams, LLC, The Juvenile Justice Project of Louisiana (JJPL), and Families and Friends of Louisiana's Incarcerated Children (FFLIC) have agreed to act jointly as co-counsel, if the court so designates them.

Proposed class counsel will fairly and adequately protect the interests of the class, fully satisfying the requirements of Rule 23(g). Proposed class counsel have worked for many months in identifying and investigating the claims in this action, through numerous interviews with named Plaintiffs, scores of other putative class members and with other potential fact witnesses, extensive factual and legal research, and review of named and putative plaintiffs' court records. Proposed Plaintiffs' counsel have significant experience in handling class actions and other complex litigation, including the very matters asserted in this case, namely, civil rights actions on behalf of institutionalized persons; and proposed class counsel are knowledgeable in the applicable law. Lastly, all three of the organizations have committed major staffing and material resources to the representation of the putative class. In sum, Plaintiffs' counsel fully satisfy the

criteria for class counsel set forth in Rule 23(g) and Plaintiffs respectfully request that the Court appoint them as such in its class certification order.

IV. CONCLUSION

For the foregoing reasons, pursuant to Federal Rule of Civil Procedure 23 and Local Rule 23.1, Plaintiffs' request the Court should certify the class defined as all children who are currently or who will in the future be held in secure confinement under the legal and physical custody of the Louisiana Office of Juvenile Justice.

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