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Civil Rights Division  
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ATTORNEYS FOR APPLICANT FOR  
INTERVENTION

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

HAYES WILLIAMS, <u>et al.</u> ,	)	
	)	
Plaintiffs,	)	Case No. 92-001-B
	)	
UNITED STATES OF AMERICA,	)	
	)	
Applicant for Intervention,	)	
	)	
v.	)	
	)	
BRUCE N. LYNN, <u>et al.</u> ,	)	
	)	
Defendants.	)	
	)	

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MOTION TO INTERVENE

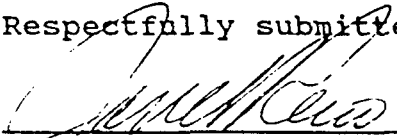
The United States of America, Applicant for Intervention, hereby moves this Court for an order granting leave to intervene as of right as a plaintiff in this action pursuant to Rule 24(a)(1), Fed. R. Civ. P. and Section 5 of the Civil Rights of Institutionalized Persons Act (CRIPA), 42 U.S.C. §1997c(a)(1).

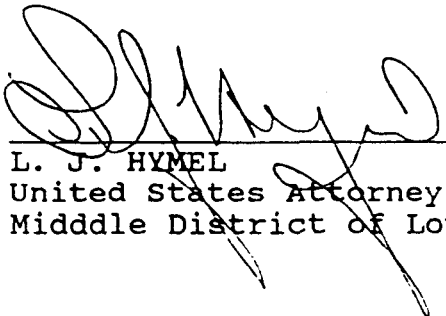
The grounds for this motion are set forth in the accompanying memorandum in support of the motion. The certification of the

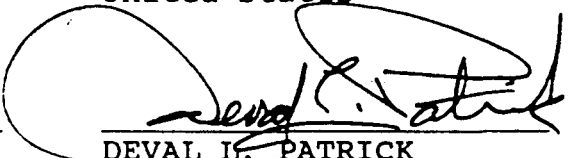


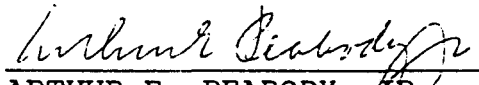
Attorney General required for intervention by §1997c(b)(1) of  
CRIPA is attached hereto and incorporated herein by reference.


Respectfully submitted,

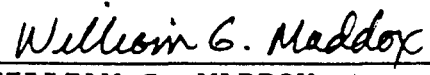
  
\_\_\_\_\_  
JANET RENO  
Attorney General of the  
United States

  
\_\_\_\_\_  
L. J. HYMEL  
United States Attorney  
Middle District of Louisiana

  
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Assistant Attorney General  
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ARTHUR E. PEABODY, JR.  
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Special Litigation Section

  
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BENJAMIN P. SCHOEN  
Deputy Chief  
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Washington, D.C. 20530

CERTIFICATE OF THE ATTORNEY GENERAL

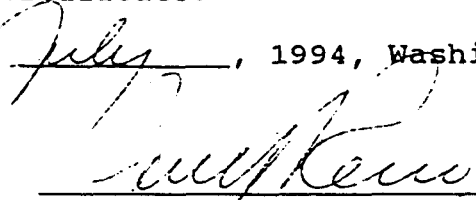
This Certificate is made pursuant to Section 5 of the Civil Rights of Institutionalized Persons Act, 42 U.S.C. §1997c(b)(1), in support of the United States' Motion To Intervene as a Plaintiff in Williams, et al. v. Lynn, et al., Civ. No. 92-001-B (M.D. La.).

I, Janet Reno, Attorney General of the United States, certify that I have complied with all subsections of 42 U.S.C. §1997c(b)(1)(A). I further certify, pursuant to 42 U.S.C. §1997c(b)(1)(B), my belief that intervention by the United States in this action is of general public importance and will materially further the vindication of rights, privileges or immunities secured or protected by the Constitution of the United States.

In addition, I certify that I have the "reasonable cause to believe" set forth in 42 U.S.C. §1997c(a)(1) to intervene in this action. Finally, I certify that all prerequisites to intervention under 42 U.S.C. §1997c have been met.

Pursuant to 42 U.S.C. §1997c(c), I have personally signed the Motion To Intervene. Pursuant to 42 U.S.C. §1997c(b)(2), I am personally signing this Certificate.

Signed this 5 day of July, 1994, Washington, D.C.

  
\_\_\_\_\_  
JANET RENO  
Attorney General  
of the United States

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

HAYES WILLIAMS, RAUL RAMOS, :  
THAD TATUM, LESLIE SHERIDAN, :  
ALBERT LANDRY, ROBERT McCUIN, :  
TERRANCE BUTLER, MARK HALL, :  
THOMAS LAWDINS, :  
CHARLES HAMILTON and : CASE NO. 92-001-B  
LEONARD GRIFFIN, :  
on behalf of themselves :  
and all others presently :  
incarcerated or who will in :  
the future be incarcerated :  
at the Louisiana State :  
Penitentiary at Angola :  
:  
Plaintiffs, :  
:  
UNITED STATES OF AMERICA, :  
:  
Plaintiff-intervenor, :  
:  
versus :  
:  
RICHARD L. STALDER, in his :  
official capacity as Secretary :  
of the Department of Public :  
Safety and Corrections, and :  
JOHN P. WHITLEY, Warden of the :  
Louisiana State Penitentiary :  
at Angola, :  
:  
Defendants. :

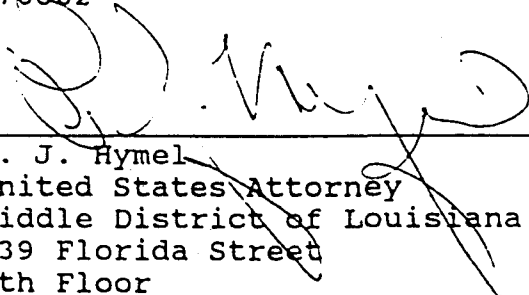
CERTIFICATE OF SERVICE

I hereby certify that the following documents, (1) the United States' Complaint in Intervention, (2) the United States' Motion to Intervene, (3) the Memorandum in Support of United States' Motion to Intervene as Plaintiff, and (4) the United States' Proposed Order Granting Intervention were served by Federal Express mail, this 20th day of July, 1994, upon the following counsel for defendants:

Richard A. Curry, Esq.  
McGlinchey Stafford Lang  
Ninth Floor  
One American Place  
Baton Rouge, LA 70825

I also certify that the above stated documents were served by  
Federal Express mail, this 20th day of July, 1994, upon the  
following counsel for plaintiffs:

Keith B. Nordyke, Esq.  
June E. Denlinger, Esq.  
Nordyke and Denlinger  
427 Mayflower Street  
Baton Rouge, LA 70802



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L. J. Hymel  
United States Attorney  
Middle District of Louisiana  
339 Florida Street  
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Baton Rouge, LA 70801