



PC-ME-001-001

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

KENNETH BROWN, JERRY LARRIVEE,)
LEROY GOVE, ROBERT SMITH, and)
JOHN GRAHAM, individually,)
and on behalf of all others)
similarly situated,)

Plaintiffs,)

v.)

COMPLAINT

JOHN MCKERNAN, Governor of the)
State of Maine, DONALD ALLEN, in)
his official capacity as the)
Commissioner of the Department of)
Corrections, and MARTIN MAGNUSON,)
in his official capacity as the)
Superintendent of the Maine State)
Prison,)

Defendants.)

I. INTRODUCTION

This 42 U.S.C. §1983 class action[[]is brought on behalf of (1) all persons who are currently or may in the future be confined in the protective custody units of the Maine State Prison (hereinafter referred to as "MSP"); (2) all persons who are currently or may in the future be confined in the administrative segregation units at the MSP; and (3) all prisoners who are currently or may in the future be confined in the East Wing Annex of the Prison.[]] Plaintiffs assert that the totality of the conditions in these units fall below contemporary standards of human decency described by the Eighth and Fourteenth Amendments of the United States Constitution. Severe and chronic overcrowding at

the MSP has outstripped the existing physical plant and services in these areas, and has produced a dangerous combination of grossly inadequate environmental, health, and safety conditions.

Through this action, plaintiffs seek to obtain a declaratory judgment that their constitutional rights are being violated and a permanent injunction to remedy the conditions that are causing the violations.

II. JURISDICTION AND VENUE

1. Jurisdiction is conferred by 28 U.S.C. §1343, which grants federal district courts original jurisdiction over suits seeking to redress deprivations under color of state law of rights, privileges, or immunities secured by the United States Constitution. Declaratory relief is authorized by 28 U.S.C. §§2201 and 2202. A federal cause of action exists in this case by virtue of 42 U.S.C. §1983, since the constitutional deprivations are being inflicted by persons acting under color of state law.

2. Venue lies in this Court pursuant to 28 U.S.C. §1392(b). Defendants, Governor McKernan, Commissioner Donald Allen, and Warden Martin Magnusson, reside or are employed in the District of Maine and each of the claims for relief arise in this judicial district.

III. PARTIES

A. Plaintiffs

3. The representative plaintiffs, Kenneth Brown, Jerry Larrivee, Leroy Gove, Robert Smith, and John Graham, are inmates of the MSP. Each proposes to represent a certified class of inmates who have been or may be confined in the protective custody units, the administrative segregation units, and the East Wing Annex, respectively.

4. Kenneth Brown, Jerry Larrivee, and John Graham are currently confined in the protective custody units at the MSP.

5. Robert Smith is currently confined in the administrative custody unit at the MSP.

6. Leroy Gove is currently confined in the East Wing Annex at the MSP.

B. Defendants

7. Defendant John McKernan is Governor of the State of Maine and head of the State's executive branch of government. As Governor, he appoints the Commissioner of the Department of Corrections and retains ultimate administrative authority over the Department of Corrections, a unit of the executive branch of government, as well as the MSP. Governor McKernan is sued in his official capacity.

8. Defendant Donald E. Allen is the Commissioner of the Department of Corrections for the State of Maine. As Commissioner, he exercises supervisory power over Maine state prisons, including the MSP. Commissioner Allen is sued in his official capacity.

9. Defendant Warren Magnusson is Warden of the MSP. As the prison's administrator, he has custody and control of all prisoners confined in the institution and is responsible for its daily operation. Warden Magnusson is sued in his official capacity.

IV. CLASS ACTION ALLEGATIONS

10. Plaintiffs bring this action on their own behalf and, pursuant to Rule 23(a) and (b)(2) of the Federal Rules of Civil Procedure, on behalf of the three subclasses of prisoners who have or may be incarcerated in the Protective Custody, Administrative Segregation or East Wing Annex units of the MSP.

11. The class of prisoners who are currently or may in the future be confined in the protective custody units of the prison consists of approximately fifty (50) inmates at any one time.

12. The class of prisoners who are currently or may in the future be confined in the administrative segregation units of the MSP consists of approximately twenty (20) to forty (40) inmates at any one time depending on the extent of double-celling, and an indeterminate number of prisoners who may be placed in these units in the future.

13. The class of prisoners who are currently or may in the future be confined in the East Wing Annex consists of approximately sixteen (16) inmates at any one time, and an indeterminate number of prisoners who may be placed in this unit in the future due to the fact that the prison uses the East Wing Annex as a reception area for all newly sentenced prisoners.

14. Because of the number of persons in the various subclasses, and because membership in each subclass is continuously changing, joinder of all members of the class is impractical.

15. This lawsuit challenges various conditions of confinement at the MSP and there are questions of law and fact common to the above-described subclasses, including whether defendants have violated the Eighth and Fourteenth Amendments to the United States Constitution.

16. The claims of the plaintiffs are typical of the claims of the classes that they propose to represent, and plaintiffs and their counsel will thoroughly and adequately represent the interests of these classes. The named plaintiffs have no interests and present no claims distinct from the claims of the class as a whole. Plaintiffs' counsel have substantial experience in cases of confinement litigation.

17. The defendants have acted and refuse to act on grounds generally applicable to the above-described classes, so that final injunctive and declaratory relief is appropriate on a class-wide basis as to each of the subclasses.

V. FACTUAL STATEMENT

A. Preliminary Statement

18. The MSP is Maine's only maximum security prison for men. When originally constructed in 1920, the MSP was built to hold approximately 400 prisoners. It currently houses approximately 500 inmates. From 1978 to 1984, the MSP was the subject of litigation concerning conditions. See Lovell v. Brennan, 556 F.Supp. 672 (D.Me. 1983), aff'd 728 F.2d 560 (1st Cir. 1984). As a direct result of that litigation, improvements were made at the prison that benefited the general population inmates. In the ensuing years, these improvements have come undone, as chronic overcrowding has resulted in pre-Lovell conditions in many parts of the prison. Nowhere are the effects of overcrowding more evident than in the protective custody, segregation, and East Wing Annex areas of the prison.

19. The majority of protective custody inmates are confined in a series of tiny cells measuring thirty-five square feet, a space approximately the size of a walk-in closet. Although the cells are grossly inadequate for a single prisoner, two men are crammed in an area seven feet deep and five feet across, together with their bunks, a toilet/sink unit, and personal belongings. To compound matters, these cells are located in a dim, poorly ventilated cellar, creating an unmistakably dungeon-like environment. The only area outside their cells in which these men can take their meals or otherwise move about is the walkway that adjoins the cells. The very limited activities available to these

inmates must be done exclusively in this walkway area since, with few exceptions, these men are confined in their corridors all day, every day, without any meaningful opportunity to go outdoors for weeks and months at a time. The reality is that their life is devoid of any meaningful activity. For many of the prisoners, the ordeal has stretched into years (for some it is approaching a decade), and will most likely continue for the duration of their sentences.

20. The makeshift dormitory where the balance of the protective custody inmates are confined has a similar dungeon-like atmosphere. Although there are no crammed cells, the overcrowding and general squalor is equally apparent. Showers and toilets are damaged and remain so for months, windows are broken out or do not operate, lights are not replaced and the area is generally filled with the odor of too many bodies confined to an area far too small for the number of prisoners living there. Like their counterparts in the other protective custody unit, these prisoners pass their time staring at the television or looking out dirt-caked windows as the general population inmates move freely toward work or education sites, the gym or ballfield, or simply the messhall.

21. Conditions in the disciplinary and administrative segregation units are also deplorable. Again, because of the lack of available bed space, two prisoners have been routinely confined in cells that are inadequate to house even one. Prisoners in this unit fare worse than their protective custody

prisoners, however, because they are locked down in their cells twenty-three hours a day behind a solid boxcar-style door with absolutely nothing to pass the time. This routine can go on for weeks or months and longer. This practice is even more questionable since many of these inmates are assaultive and unpredictable or they would not be placed in this unit. To place two violent individuals in a tiny cell obscured by a solid metal door seriously jeopardizes the safety of both prisoners. Indeed, prison officials require segregation inmates who are double-celled to sign a disclaimer of liability. The situation is compounded by the fact that protective custody inmates and new arrivals have been confined in this unit while waiting for an available bed in protective custody units or general population, and by the fact that dangerous intermingling of the classification occurs in cell assignments. Although efforts have been made in the past few months to discontinue at least temporarily the practice of double-celling in the segregation unit, the department has indicated that it is reserving its right to reinstitute this dangerous practice.

22. The final housing area addressed in this lawsuit is the East Wing Annex. Living conditions in the Annex transgress acceptable standards, whether measured against relevant public health standards or contemporary standards of decency. So bad are conditions in the unit that the Maine Legislature recently ordered the unit closed when new facilities come on-line. Located at the base of the East cellblock, this makeshift dormitory

houses new arrivals for up to six months under conditions resembling a cage within a cage. The Annex is constructed from a former corridor space at the base of several tiers of cells that rise above it. As a result, inmates confined to this area must endure constant observation, and the harassment and throwing of liquids and garbage by other prisoners on the tier that rise above them. Apart from this objection, it is abundantly clear that like 4-dormitory, there are too many men living in too small quarters. The entire unit is double-bunked without even a single shower for sixteen men. The one toilet is frequently damaged and out of order. Sanitation, lighting and ventilation are all dangerously substandard, and fire safety and industrial maintenance are seriously deficient. Confinement under these conditions for any length of time is unacceptable, especially for new arrivals, and the unit should be closed immediately, as recognized by the Maine Legislature.

B. Protective Custody Living Conditions

23. The protective custody unit is a segregated housing area established to provide a safe and secure environment for those prisoners whose lives are at risk in the general prison population. Protective custody status is not a disciplinary measure and can be obtained voluntarily or involuntarily. The criteria typically involve an assessment that the prisoner is vulnerable to assault by other prisoners based on a number of factors, including: (a) a conflict with another prisoner developed in prison or carried over from the streets; (b) the na-

ture of the prisoner's crime; (c) mental illness or diminished mental capacity; or (d) the youth, size, maturity or relative inexperience of the prisoner. Once protective custody status has been assigned, the process is generally not reversible because of the stigma associated with the unit. The length of stay on the protective custody unit typically lasts the duration of the inmate's confinement at the prison, frequently extending into periods of 2-5 years and longer. Protective custody prisoners are confined in two principal areas of the prison. The first area is designated as dormitories 6 and 11, and consists of two rows of back-to-back cells located in the basement of the prison's West cellblock. The second area is known as 4-Dorm, and is designed as an open bay style dormitory.

(1) 6 and 11 Dormitories

24. Dormitories 6 and 11 are designed to house 16 prisoners in a series of individual cells. At present, 32 men are confined in converted double-bunked cells. Dormitories 6 and 11 are located below ground level and are dim, dank, dirty and noisy, creating an unmistakably dungeon-like atmosphere.

25. The individual cells measure approximately 35 square feet, 7 feet deep and 5 feet wide. Each cell houses two inmates, and is furnished with two beds, a toilet and sink, and a desk and chair. Additionally, the cells are crammed with the personal effects of the occupants, including books, clothing and, if the inmate has the funds to purchase them, a fan, television, or radio. There is little or no floor space.

26. Confinement in such close quarters falls below all correctional and public health/fire safety standards for confinement of a single prisoner, let alone two.

27. High density confinement of this sort promotes the spread of airborne infectious diseases, poses a grave risk of injury or loss of life in the event of fire or other emergency requiring immediate evacuation, and induces severe psychological stress, thereby increasing tensions and the potential for injuries resulting from assault.

28. Plaintiff Kenneth Brown was recently stabbed in the chest with a screwdriver by another protective custody inmate while confined in the unit.

29. Inadequate heating and ventilation results in temperature that are often unbearable. The air is rife with the odor of too many men living, eating and using the bathroom in too small a space, and with the haze of cigarette smoke. Because of the stifling conditions, the potential for spreading airborne disease is magnified, as is the risk of developing respiratory or nasal conditions.

30. The clamor of voices competing with each other and raised over the sounds of other activities echoes off the walls, constantly reaching deafening and harmful stress-inducing levels.

31. Whatever sunlight comes through the dirty windows that partially extend down into the unit lasts only a few hours each day.

32. The artificial lighting that the unit is dependent on is grossly inadequate, particularly at night and in the cells. The resultant eyestrain and headaches make reading and writing practically impossible.

33. Fire safety measures have not been taken or fully implemented. The cells are crammed with combustibles, such as tattered mattresses and pillows, linens, clothing, reading and writing materials, and whatever other personal effects the prisoners may have acquired. Cigarette smoking is omnipresent. The number of electrical outlets in the cell are insufficient, forcing the inmates to rely on the dangerous practice of jerry-rigging the wires to operate their fans, radios or portable televisions. Cell dormitories are double-locked at night and must be opened individually, preventing immediate evacuation. Fire drills are never conducted. These conditions, combined with the overcrowding, create a serious risk of fire and the loss of life.

34. All meals are taken in the living unit, with food being handled a few feet from the common toilet. Daily meals are served between 7:00 a.m. and 3:30 p.m., leaving almost 16 hours between the evening and morning meals -- a delay that is unacceptable by any dietary standards. Food is transported in containers that do not maintain the proper food temperature, thereby increasing the risk of food-borne sickness. During transport the food is frequently tampered with by other prisoners. Urine, saliva, insects and glass have all been found in the food.

35. When not confined in their cells, the prisoners are allowed to enter the walkway that is adjacent to the cells. While this area has been set up as a dayroom of sorts, it amounts to little more than a small corridor furnished with tables and chairs where the inmates can eat, shower or otherwise congregate.

36. Out-of-cell time is restricted to daytime hours (until 4:30), although it is extended to 9:00 p.m. 3 days a week. At all other times these men are locked in their cells.

37. Three or four days a week, between 6:00 and 7:00 a.m., weather and daylight permitting, protective custody inmates are given the option of going outdoors into a fenced area referred to derisively by the inmates as the "bullpen" or "playpen." The pen encloses a small area of sloping ground devoid of any of the recreational equipment commonly found in prison yards, such as a basketball hoop, weights or other exercise equipment. Moreover, the pen is located in an area that is in full view of the general population.

38. Because of verbal harassment, fear of assault by general population inmates, the early hour and the total lack of anything to do except pace around the pen, the overwhelming majority of protective custody inmates do not go out to the bullpen. This is especially true of those who for mental health or other reasons are vulnerable to the threats and harassment that accompany a trip to the pen. For this reason, many protective custody prisoners have not been outside for months or in some cases years.

39. At no time are protective custody inmates brought to any of the recreational facilities available to general population inmates, such as the library, the recreation hall, the gymnasium or the ballfield. Nor are they eligible for such congregate activities as church services, movies, or charitable services sponsored by local community groups, i.e., Jaycee functions.

40. Protective custody inmates have no meaningful access to legal materials. To obtain legal materials they must rely on a paging system of requesting books by title. The practice denies direct access to the library and is imbued with delay and error, making meaningful use of legal materials impossible.

(2) 4-Dormitory

41. 4-Dorm differs from dormitories 6 and 11 in its open bay construction, as opposed to a series of individual cells. In all other respects, the physical conditions and oppressive daily routine are generally the same, except that when filled to capacity, the level of crowding and general ^{equator} population is even more apparent.

42. Converted from former office space, the dormitory currently houses fourteen protective custody prisoners, although, upon information and belief, it has confined as many as 25 or 30. The living area is furnished with single and double-bunks and attendant footlockers for the storage of personal effects.

43. The adjoining walk-in dayroom is furnished with tables and chairs where the inmates eat, watch television, and otherwise pass the time.

44. The combined square footage of the living and dayroom area falls far below all correctional and public health standards for the confinement of prisoners in a dormitory setting.

45. High density confinement of this sort in an open dormitory setting is imbued with the same dangers described above, namely increased potential for the spread of airborne disease and the threat of loss of life in the event of fire or other emergency requiring immediate evacuation.

46. The potential for stress-induced disorders or violence typically associated with overcrowding is significantly increased by the absence of any privacy or refuge in a dormitory setting.

47. The overcrowding in the dormitory is exacerbated by the general state of disrepair that exists. The condition is attributable to overtaxation of the physical plant. Showers and toilets are constantly out of order. Windows are broken and are boarded over or welded shut, lighting, ventilation and heating are inadequate. Repairs take weeks and months. For the last several months only one of three showers has been working, and that one has been jerry-rigged by the inmates to keep it working. The general level of sanitation in the unit is dangerously unhealthy.

48. Like their counterparts in dormitories 6 and 11, dormitory 4 prisoners have access to none of the programming and recreational activities available to other inmates. Their daily routine ^{consists} exists almost entirely of milling about the dormitory, watching television or sleeping. This routine goes on for months and years at a time.

49. The crowding, general squalor, and pervasive idleness combine to create^a ~~ing~~ a stifling dungeon-like atmosphere very similar to the conditions in 6 and 11 dormitories.

C. East Wing Annex Conditions

50. In the oldest section of the prison, known as East Wing, a make-shift dormitory has been constructed from a former corridor at the base of the several tiers of cells that rise up above it. This dormitory has been designated at the East Wing Annex. It has been established as a diagnostic and classification unit for new arrivals.

51. Conditions are so bad in the Annex that in recent years it has been universally condemned by Maine correctional officials and politicians. Recently, the Maine Legislature passed legislation ordering the Annex to be closed in the future.

52. Because of its location in relation to the cells above it, the dormitory is a cage within a cage, with the occupants being under constant observation both by guards and other prisoners alike.

53. Prisoners in the Annex are subjected to jeers and harassment -- partly because of their new arrival status -- from the prisoners above. Although there is a protective grill in place, liquids, such as urine, and other objects, notably cigarette butts, are thrown from above. For arriving inmates, this experience can be terrifying and result in the types of stress disorders typically associated with violence or suicide.

54. The entire diagnostic and medical process for new arrivals takes only approximately two weeks. Because of the lack of available cell space, the typical stay in the annex lasts, however, from four to six months.

55. The Annex is uniquely inappropriate as a reception unit, not only because it places new arrivals in the shocking conditions described above, but because it places them in direct contact with the other population without proper medical screening. The spread of airborne disease, such as tuberculosis, is dangerously possible under these circumstances.

56. The unit is set up dormitory style and is furnished with eight double beds, a toilet, and a couple chairs and tables. Typically, sixteen prisoners are confined in the Annex at any given time.

57. The amount of space in the Annex relative to the number of prisoners is inadequate when measured against correctional and public health standards and fire safety codes. Similarly, the provision of a single toilet and sink, and the lack of a shower (inmates must walk to another building to shower) is contrary to

all public health standards. These inadequacies negatively affect inmate hygiene and promote the continuation of spread of airborne disease.

58. Physical conditions in the unit are comparable to those described as existing in dormitory 4. Lighting, ventilation, temperature control, noise levels and the general level of sanitation and disrepair are all dangerously unsafe. Inadequate heat is particularly a problem in the Annex because of its unique construction from corridor space. As a result, very cold drafts sweep through the unit in fall and winter months. Day after day, prisoners in the Annex must suffer the indignity of living in this fishbowl. The conditions that are present combine to create a maddening experience from which there is no refuge or escape.

D. Segregation Unit Conditions

59. The segregation unit is located in West Block on the top floor. It is subdivided into four areas -- Southside, Northside, Plankside and Restraint. There are eleven Southside cells, eleven Northside cells, six Plankside cells and three Restraint cells. Cells on the North and Southsides measure approximately 48 square feet and are or have been double-bunked. Plankside and Restraint cells measure 35 square feet and are reserved for disciplinary cases or for inmates in observation status. All cells in the segregation unit are of the "double door" construction and are equipped with toilet facilities.

60. Excluding the cells set aside for the disciplinary and observation cases, the remaining 22 cells located on North and South sides are designed as administrative segregation unit. For the last several years these cells have been continuously double-celled, although there have been recent efforts to eliminate this practice. Administrative segregation differs from disciplinary status in that there has been no disciplinary disposition of the conduct leading to confinement in the unit. Inmates in administrative segregation status are generally on this status because they present a danger to themselves or others in the general population. The typical stay lasts for weeks or months, and even years.

61. In practice, the administrative segregation unit has not been utilized strictly for these purposes. In the past two to three years other categories of prisoners have been confined on this unit because of lack of available bedspace elsewhere. These include protective custody inmates and new arrivals. While some efforts have been made to maintain strict separation of the different categories of inmates on the unit, and to eliminate double-celling altogether, there have been repeated examples of intermingling, both on the same row of cells and even within the same cell.

62. The practice of double-celling segregation inmates is fraught with the intrinsic danger of injury or loss of life and is contrary to all correctional standards for the confinement of special management prisoners. Persons in this status are violent and unpredictable.

63. The practice of confining new arrivals and protective custody inmates on the administrative segregation unit is just as dangerous and contrary to correctional standards. To intermingle the classifications in the same cell recklessly disregards the health and safety of these prisoners.

64. Upon information and belief, on at least two occasions in recent years, inmates were victimized because of an improper double-celling assignment in this unit. One resulted in the rape of a twenty year-old new arrival by a prisoner serving a life term. The other involved a suicide encouraged by the cell-mate and other prisoners.

65. When required to double-cell, MSP officials seek the consent of the prisoners. In doing so, they obtain the waiver of liability from the prisoners.

66. Inmates in the segregation unit are locked down 23 hours a day. They are permitted out in small groups for the remaining hour to shower, clean their cells, talk and mill about, and occasionally to go outside to the bullpen area for part of the hour, weather and staff permitting. In reality, however, most inmates, especially protective custody inmates confined on the unit, rarely go out for recreation. Significantly, none of

the inmates kept in the Plankside or Restraint side is permitted any outdoor recreation time. (Disciplinary segregation inmates are confined for up to 30 days for each conviction, and multiple convictions can be served consecutively.)

67. Conditions in the cells are not unlike those in dormitories 6 and 11, described above. Almost all the space is occupied by the furnishings, toilet facilities, and the prisoners' personal belongings.

68. The close quarters, when combined with inadequate ventilation and lighting, present the same public health and fire safety risks described previously. The stress induced by living in such close quarters is compounded by their virtual lockdown status.

69. Meaningful legal access is denied because of the reliance on a paging system, thereby denying direct access to the law library.

VI. CLAIMS FOR RELIEF

70. The totality of conditions at MSP is incompatible with contemporary standards of decency and results in unnecessary and wanton infliction of pain and suffering. By depriving plaintiffs of such basic human needs as adequate shelter and personal safety, and unnecessarily imposing such harsh restrictive conditions, the defendants are violating plaintiffs' rights to be free from cruel and unusual punishment as proscribed by the Eighth Amendment to the United States Constitution.

71. The denial of reasonable access to a prison law library deprives plaintiffs of their right of meaningful access to the courts as guaranteed by the Sixth Amendment and the Due Process Clause of the Fourteenth Amendment of the United States Constitution.

VII. NO ADEQUATE REMEDY AT LAW

72. As a result of defendants' policies, practices, acts, and omissions, plaintiffs are being irreparably harmed. They are suffering unnecessary pain and anguish, psychological as well as physical harm and impairment, and the loss of their right to be imprisoned under conditions that do not inflict cruel and unusual punishment. Plaintiffs have no adequate remedy at law to redress the wrongs described herein. Plaintiffs will continue to be irreparably injured by defendants' policies, practices, acts, and omissions unless this Court grants comprehensive injunctive relief to abate the unconstitutional conditions that now exist in the institution.

VIII. PRAYER FOR RELIEF

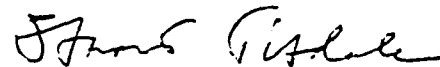
73. On the basis of the foregoing, the plaintiffs respectfully ask the Court to:

1. Certify this cause as a class action.
2. Declare that the conditions described above violate the constitutional rights of the plaintiffs to be free from cruel and unusual punishment.

3. Declare that defendants have denied plaintiffs and the class they represent their constitutional right to procedural due process and their right of access to the courts.
4. Enjoin the defendants, their agents, employees and all persons acting in concert with them from subjecting the plaintiffs to the unconstitutional conditions and practices described above.
5. Enjoin the use of double-celling in dormitories 6 and 11 and the segregation unit, enjoin the housing of prisoners in the East Wing Annex, and alleviate the crowding in dormitory 4.
6. Retain jurisdiction of this case until all remedial orders have been fully implemented.
7. Award plaintiffs their reasonable costs and attorneys' fees.
8. Grant whatever additional relief may be just and appropriate.

DATED: October 12, 1990

Respectfully submitted,



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