

JOHN ANDERSON, MICHAEL : 14TH JUDICIAL DISTRICT COURT  
GUILLORY, TIMOTHY WILLIAMS,  
RAMON LEBLANC, ROBIN  
LEBLANC, JASON RAY LEGER,  
CARL RICHARD, SR., JULIAN  
MARTIN SOLOMON, JR. AND  
CHARLIE MYERS ON BEHALF  
OF THEMSELVES AND ALL  
OTHERS SIMILARLY SITUATED

VS. NO. \_\_\_\_\_ : PARISH OF CALCASIEU

THE STATE OF LOUISIANA, : STATE OF LOUISIANA  
KATHLEEN BLANCO, IN HER  
OFFICIAL CAPACITY AS THE  
GOVERNOR OF THE STATE  
OF LOUISIANA, AND THE  
LOUISIANA STATE LEGISLATURE

FILED: \_\_\_\_\_ :  
DEPUTY CLERK OF COURT

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Plaintiffs hereby request that this Court certify this proceeding as a class action pursuant to Louisiana Code Civ. P. art. 591(A) and 591(B)(2) for the reasons set forth below and in Plaintiffs' supporting memorandum of law:

1. The requested class consists of all adults who are or will be entitled to appointed counsel to represent them against criminal charges in the Fourteenth Judicial District in Calcasieu Parish.

2. The class is so numerous that joinder of all members is impracticable. During the course of a year, thousands of adults, upon arrest or detention, are or will be entitled to have counsel appointed to represent them in the Fourteenth Judicial District Court.

3. There are questions of law and fact common to the class. All members of the proposed class are equally subject to the policies and practices that constitute the factual core of the class claims. Their claims also concern a common legal question: the application of the right

to counsel, as guaranteed by the Sixth and Fourteenth Amendments to the United States Constitution, and Article 1, Sections 2 and 13 of the Louisiana Constitution of 1974.

4. The system of providing appointed counsel, and policies and practices under that system, challenged in this action apply with equal force to the named Plaintiffs and all members of the class so that the claims of the named Plaintiffs are typical of those of the class. There are no significant factual differences between the policies and practices that the named Plaintiffs face and those to which the entire class is subject.

5. The named Plaintiffs will fairly and adequately represent the interests of the class. They possess the requisite personal interest in the subject matter of the lawsuit. They are represented by attorneys experienced in complex civil litigation.

6. The class is or may be defined objectively in terms of ascertainable criteria, such that the Court may determine the constituency of the class for purposes of the conclusiveness of any judgment that the Court deems appropriate.

7. Defendants have acted and refused to act on grounds generally applicable to the class, thereby making appropriate final declaratory and injunctive relief with respect to the class as a whole.

8. In further support of this motion, named Plaintiffs incorporate the allegations of their complaint.

For these reasons, Plaintiffs respectfully request that this Court certify this action as a class action for the purposes of injunctive and declaratory relief.

Respectfully Submitted,

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