

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

ALEX A., by and through his guardian, Molly
Smith; BRIAN B.¹; and CHARLES C., by and

- (1) Immediately transfer Plaintiff Charles C. and all putative class members currently housed at the OJJ Angola facility (also known as Bridge City – West Feliciana) out of that facility, to OJJ children’s facilities that provide all legally-required services, education and supports for children adjudicated delinquent; and
- (2) Immediately cease placing at or transferring any children in OJJ’s custody to the OJJ Angola facility.

In the alternative, Plaintiffs Alex A. and Charles C., on behalf of themselves and all members of the putative class, move the Court for a preliminary injunction, ORDERING Defendants to immediately take the following actions at the OJJ Angola facility:

- (1) Cease confining children in individual cells for more than 8 hours per day (for sleeping),

- (7) Provide all educational and special education services and supports that Defendants promised to provide during the September 2022 preliminary injunction hearing;
- (8) Allow and facilitate in-person, telephone and video visits for children with family members, as Defendants promised during the September 22 preliminary injunction hearing, at least two times per week; and
- (9) Provide indoor and outdoor recreation and exercise opportunities as Defendants promised during the September 2022 preliminary injunction hearing.

A proposed Order is attached hereto.

Respectfully submitted, this 17th day of July, 2023.

/s/: David J. Utter

DAVID J. UTTER *

Louisiana Bar Number: 23236

WILLIAM R. CLAIBORNE**

Georgia Bar Number: 126363

THE CLAIBORNE FIRM, P.C.

410 East Bay Street

Savannah, Georgia 31401

(912) 236-9559 Telephone

(912) 236-1neam3(isl1 225.02 598.36 Tm0 g0 (

