

JOSEPH ALLEN, STEVEN AYRES,
ASHLEY HURLBURT, RORY KEVIN
GATES, JAMES HOWARD, DEMARCUS
MORROW, RODNEY WALLER, KEITH
ARCEMENT, FREDERICK BELL,
GENARO CRUZ GOMEZ, SAM
YBARRA, MICHAEL CARTER, AND
JAMES PARK, ON BEHALF OF
THEMSELVES AND ALL OTHERS
SIMILARLY SITUATED,

Plaintiffs,

VS.

JOHN BEL EDWARDS IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE
STATE OF LOUISIANA, ZITA JACKSON
ANDRUS, CHRIS L. BOWMAN,
FLOZELL DANIELS, JR., THOMAS D.
DAVENPORT, JR., PATRICK J.
FANNING, W. ROSS FOOTE,
KATHERINE E. GILMER, MICHAEL C.
GINART, JR., FRANK HOLTHAUS,
DONALD W. NORTH, AND MOSES
JUNIOR WILLIAMS, IN THEIR
OFFICIAL CAPACITIES AS MEMBERS
OF THE LOUISIANA PUBLIC
DEFENDER BOARD; AND JAMES T.
DIXON, JR., IN HIS OFFICIAL
CAPACITY AS THE LOUISIANA STATE
PUBLIC DEFENDER,

Defendants.

FILED: _____

DEPUTY CLERK

**PLAINTIFFS' MOTION TO CERTIFY A
CLASS ACTION PURSUANT TO ARTICLE 591**

Plaintiffs Steven Ayres, Ashley Hurlburt, Demarcus Morrow, Keith Arcement, Frederick Bell, Michael Carter and James Park move this Court for an order: (1) certifying a class of "All persons who are indigent and facing charges in Louisiana of a non-capital criminal offense

punishable by imprisonment, excluding criminal defendants represented by private counsel, criminal defendants who are voluntarily and knowingly representing themselves pro se, and juveniles charged with criminal offenses but whose cases are assigned only to juvenile court”; and (2) appointing Jones Walker LLP, Southern Poverty Law Center, Davis Polk & Wardwell LLP and the Lawyers’ Committee for Civil Rights Under Law as co-lead class counsel. Plaintiffs represent that this matter has not been set for trial and that testimony will be offered at the hearing.

Respectfully submitted,

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*Application for Pro Hac Vice Admission,
Pursuant to LA Supreme Court Rule XVII, §
13, Pending before the Court

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon all counsel of record by depositing same in the United States mail, postage prepaid and properly addressed and/or by electronic mail, this ____ day of May, 2017.

JARED F. DAVIDSON