

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

J.H., BY AND THROUGH HIS  
MOTHER AND NEXT FRIEND, N.H.;  
I.B., BY AND THROUGH HIS PARENTS  
AND NEXT FRIENDS, A.B. AND I.B.,  
ON BEHALF OF THEMSELVES AND  
ALL OTHERS SIMILARLY SITUATED

CIVIL ACTION NUMBER  
3:20-cv-00293-JWD-EWD

VERSUS

JOHN BEL EDWARDS, IN HIS  
OFFICIAL CAPACITY AS GOVERNOR  
OF LOUISIANA; THE LOUISIANA  
OFFICE OF JUVENILE JUSTICE;  
EDWARD DUSTIN BICKHAM, IN HIS  
OFFICIAL CAPACITY AS INTERIM  
DEPUTY SECRETARY OF THE  
LOUISIANA OFFICE OF JUVENILE  
JUSTICE; JAMES WOODS, IN HIS  
OFFICIAL CAPACITY AS THE  
DIRECTOR OF THE ACADIANA  
CENTER FOR YOUTH; SHANNON  
MATTHEWS, IN HER OFFICIAL  
CAPACITY AS THE DIRECTOR OF  
THE BRIDGE CITY CENTER FOR  
YOUTH; SHAWN HERBERT, IN HIS  
OFFICIAL CAPACITY AS THE  
DIRECTOR OF THE SWANSON  
CENTER FOR YOUTH AT MONROE;  
AND RODNEY WARD, IN HIS  
OFFICIAL CAPACITY AS THE  
DEPUTY DIRECTOR OF THE  
SWANSON CENTER FOR YOUTH AT  
COLUMBIA

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**MEMORANDUM IN RESPONSE TO PLAINTIFFS' EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING ORDER SEEKING IMMEDIATE FURLOUGH**

NOW INTO COURT, through undersigned counsel, comes Defendant, JOHN BEL  
EDWARDS, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE STATE OF

LOUISIANA, who opposes plaintiffs' request for a temporary restraining order seeking immediate furlough [Rec Doc 7]. In support, Defendant adopts and incorporates herein the Response to Plaintiffs' Motion for Temporary Restraining Order filed by The Louisiana Office of Juvenile Justice [Rec Docs 25].

Dated: May 26, 2020

RESPECTFULLY SUBMITTED:

*s/Matthew F. Block*

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**MATTHEW F. BLOCK** (Bar Roll #25577)

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*Attorney for JOHN BEL EDWARDS*

*GOVERNOR*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 26, 2020, I electronically filed the forgoing with the Clerk of Court by using the CM/EMF system, which will send a notice of electronic filing to all counsel of record.

*s/Matthew F. Block*

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**MATTHEW F. BLOCK**