

into cellblocks that the tension and volatility caused by lack of space results in weekly stabbings, fights, and assaults. Donaldson is acutely understaffed, leaving correctional officers unable to provide appropriate security.

3. The potential for violence at Donaldson is exacerbated by the absence of appropriate security measures, the ready availability to inmates of weapons, cell phones, cocaine, heroin, methamphetamines and other drugs inside the prison, the dearth of work, vocational, or other activities, unbearably hot temperatures during the summer, and the dilapidated condition of prison buildings.
4. As a result of these conditions and the Defendants' deliberate indifference to them, an atmosphere of chaos and volatility reigns at Donaldson. Stabbings and beatings have left prisoners with slit throats, punctured livers, pierced lungs, loss of vision, paralysis, disfigurement, and other injuries, as well as psychological trauma.
5. Plaintiff JOHN HICKS was blinded in one eye after being attacked by a prisoner with mental illness.
6. Plaintiff JAMES TAYLOR was stabbed in the face and shoulder by a prisoner wielding a knife.
7. Plaintiff CHARLES MALEC was asleep in his bunk in an open dorm when a prisoner slashed his face with a razor from his temple to his neck. At the time, there was no officer present in the

dorm of approximately 130 men.

8. Plaintiff GREGORY WYNN was assaulted by an officer who stomped on his back and maced him in the face without provocation.
9. At all times relevant to the events described herein, defendants have had knowledge of the substantial risk of serious injury presented to plaintiffs.
10. Defendants have consciously, unreasonably, and unconscionably disregarded the risk of such harm to plaintiffs, allowing such injuries to occur.
11. Defendants have failed to carry out their statutory and constitutional obligations to provide for the basic safety and security of prisoners at Donaldson. Plaintiffs bring this action on behalf of themselves and all others similarly situated, seeking injunctive relief, pursuant to 42 U.S.C. § 1983 and the Eighth and Fourteenth Amendments to the United States Constitution.

II. JURISDICTION

12. This action is brought pursuant to 42 U.S.C. § 1983. This Court has jurisdiction over plaintiffs' claims pursuant to 28 U.S.C. §§ 1331 and 1343, and the United States Constitution.
13. This Court is authorized to grant declaratory and injunctive relief under 28 U.S.C. §§ 2201 and 2202.

III. VENUE

14. The Middle District of Alabama is an appropriate venue for this action under 28 U.S.C. § 1391(b) because a "substantial part of the events or omissions giving rise to the claim[s] occurred" in this district. Specifically, decisions about funding, staffing, investigations, maintenance and repairs, and the number of people housed at Donaldson are made at the central office of the Department of Corrections, headquartered in this district. In addition, one or more of the defendants lives in this district and all of the defendants reside in Alabama.

IV. PARTIES

15. Plaintiffs JOHN HICKS, JAMES TAYLOR, CHARLES MALEC, and GREGORY WYNN are serving state sentences through confinement in Donaldson Correctional Facility. All named plaintiffs have suffered physical harm due to the unconstitutional conditions at Donaldson and are in immediate danger of future harm. The named plaintiffs seek to represent themselves and all other current and future prisoners at Donaldson.

16. Defendant GARY HETZEL is the Warden of Donaldson Correctional Facility. As warden, defendant HETZEL is responsible for the day-to-day operations of the prison. Defendant HETZEL is sued in his official capacity as warden of Donaldson.

17. Defendant RICHARD ALLEN is Commissioner of the Alabama Department of Corrections. As Commissioner, ALLEN is responsible for the daily supervision of operations at the Alabama Department of Corrections. He is the highest ranking official in the Alabama Department of Corrections. Defendant ALLEN is sued in his official capacity as Commissioner of the Alabama Department of Corrections.

18. Defendant BOB RILEY is the Governor of Alabama. As chief executive of the State of Alabama, defendant RILEY has authority to exercise "all functions and duties of the department [of corrections]...acting by himself or by and through such administrative divisions or such officers or employees or individuals as he may designate." Ala. Code §§ 14-1-17, 14-1-1.1. Defendant RILEY is sued in his official capacity as Governor of Alabama.

19. At all times relevant to the events described herein, defendants were employed by and acted under color of law of the State of Alabama.

V. CLASS ACTION ALLEGATIONS

20. The plaintiffs bring this action on behalf of themselves and all others similarly situated pursuant to Rules 23(a) and (b)(2) of the Federal Rules of Civil Procedure. The class consists of all persons who are now or will in the future be incarcerated at Donaldson Correctional Facility.

21. The class is so numerous that joinder of all members is impracticable. There are approximately 1,681 men at Donaldson. This population changes often as prisoners are transferred to and from the prison.
22. There are questions of law and fact common to the class. These include the nature and constitutionality of conditions, practices, policies and treatment of men at Donaldson.
23. The conditions, policies, practices and treatment 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.
24. 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 a law office experienced in class action litigation involving unconstitutional conditions in prisons and jails.
25. 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.

VI. STATEMENT OF FACTS

26. William E. Donaldson Correctional Facility opened in 1982 as the West Jefferson Correctional Facility, with a capacity of 700 medium and minimum security prisoners held in dormitories and 16 single cells.
27. Donaldson was subsequently expanded, giving it a "designed capacity" of 968 men.¹ The number of men confined at Donaldson has more than doubled over the years. As of December 2008, Donaldson was at 173.7% capacity, holding 1,681 men.
28. Some men at Donaldson are housed in open dormitories, where beds are so close together that a prisoner can reach out his hand and touch the person in the next bunk.
29. In another part of the prison, known as "the blocks," three men are crammed into cells designed for two. These cells measure approximately 8 x 12 feet, but much of the space is taken up by bunks, property boxes, toilets, and hanging laundry. Men housed in 3-man cells do not have enough room to sit upright on their bunks or to dress. Grooming and hygiene activities often take place in the hallway. The smell of feces often permeates the cells, and overflowing toilets back up into adjacent cells.

¹ "Design capacity" means "original architecture designs plus renovations." Ala. Dep't of Corr. Dec. 2008 Monthly Statistical Report, p. 3.

30. In the summer months, the heat and lack of ventilation in the blocks becomes unbearable. Men are often confined to their locked, 3-man cells, lying on sweat-dampened mattresses. The lack of space in the blocks is so unbearable that prisoners beg officers to move them, sometimes committing assaults on other prisoners so as to be moved to another area of the prison.
31. Donaldson is so overcrowded that prisoners, who go to the dining hall in shifts, are often given just minutes to eat meals. Some eat standing up.
32. Due to overcrowding, the current level of security staff is insufficient to properly run the prison. There is a shortage of correctional officers throughout the Department of Corrections, but the staff shortage at Donaldson is particularly acute. As of December 2008, Donaldson was short 82 correctional security staff out of a total authorized number of 302 officers.
33. In March 2005, former Donaldson Warden Stephen Bullard described the shortage of officers at Donaldson as a "crisis" and wrote to the former Commissioner: "I am concerned it is going to take a lawsuit, riot, death or serious injury for anyone to take this crisis seriously." Over three years later, more than 25 percent of the authorized officer positions at Donaldson are still empty.

34. The ongoing staffing shortage compromises institutional security and the safety of prisoners and staff. In a grievance dated May 14, 2008, an officer at Donaldson warned Defendant HETZEL that the present staffing situation "does not provide enough manpower for regular posts and certainly not for any extra security requirements." In one dorm, the officer reported, two officers are assigned to guard 288 men. In the prison's south side units, there are often only two to three officers supervising 520 prisoners.

35. As a result of overcrowding and understaffing, security at Donaldson is lacking. Prisoners are routinely able to exit their cells, even when they are supposed to be locked. Prisoners, moreover, routinely leave their cellblocks and enter other areas of the prison where they are not authorized to be. Men who are assigned to A and B blocks, for example, are able to leave their assigned area, pass through several security checkpoints, and spend days at a time, undetected, in other prison dormitories on the south side of the prison.

36. Due to the shortage of security staff, officers are forced to work overtime on a regular basis. In addition to its economic cost to the prison system, excessive overtime accrual compromises security because exhausted officers are less likely to remain alert or be able to respond adequately to normal or exigent security needs.

37. Exhausted officers at Donaldson are often asleep on duty.
38. Correctional officers working in such a stressful environment have become disrespectful, short-tempered, and often violent toward prisoners, contributing to the overall volatility in the prison. Prisoners report that officers routinely curse at them, threaten them, use excessive force, and refer to them as "bitches" "f---boys," "n-----," and other derogatory names.
39. Corruption is a problem at Donaldson. A number of officers are involved in illegal activity. These officers bring drugs, cell phones, cell phone chips, and other contraband into the prison. They also serve as look outs for prisoners engaging in criminal activity, alerting those prisoners when other prison officials are approaching. Some officers participate in betting and gambling along with prisoners. Officers have engaged in sexual relationships with inmates. In one recent instance, an officer allegedly put a "hit" out on another officer who threatened to disclose the first officer's involvement in illegal activity.
40. There are an unacceptable number of instances of excessive force by officers. Charles Agee was beaten to death by officers in 2005.² Also in 2005, Sammy Duncan was struck by an officer repeatedly with a metal baton in the head, back,

² See Bogus v. Alabama Dep't of Corrections, Civil Action No. 7:06-cv-1667-RDP (N.D. Ala.).

arm, and groin, fracturing his wrist and injuring him so severely that he required surgery to remove a portion of his testicles.³

41. There are many more recent examples. On December 23, 2008, Corey Bedgood was punched in the face while handcuffed.
42. On December 12, 2008, Billy Jessie was lured into a vacant hallway by an officer with a history of excessive force and corrupt activities. The officer handcuffed Jessie and repeatedly hit him in the face and head with his radio as a sergeant looked on. Jessie was beaten unconscious. He lost a tooth and suffered a cracked jaw, two black eyes, and multiple cuts and contusions.
43. Ricardo Swift's arm was broken when an officer repeatedly hit him with a baton in June 2008. Surgery was required to repair the damage.
44. Kenneth Knabenshue was injured in March 2008, when officers stomped on his head, beat him with batons, and kicked him as he lay on the ground, handcuffed. Mr. Knabenshue's leg was swollen and bruised, his left eye was swollen shut, his ribs were bruised, blood leaked from his ear for several days, and he had numerous cuts on his face, head, and back.
45. In March 2008, Plaintiff Gregory Wynn was assaulted by an officer who threw him to the ground, placed a knee on his back, punched him in the head with a closed fist, and sprayed

³ Duncan v. Jenkins et al., 05-cv-2095-IPJ.

him directly in the face with pepper spray.

46. Kurt Taylor, a disabled man with a prosthetic leg, was beaten in April 2008 with batons, dragged into the cellblock, and kicked while he was on the ground, handcuffed.

47. Officers who repeatedly engage in unprofessional activity are not appropriately reprimanded.

48. There have also been numerous assaults on security staff, including a serious assault on a lieutenant in September 2008. As a result of this and similar assaults, security officers already fearful of walking into prisoner living areas have become even more reluctant to enter the open dormitories where they are greatly outnumbered, often leaving these areas largely unsupervised.

49. Illegal drugs are readily available at Donaldson, and drug abuse is rampant. Prisoners have ready access to crack cocaine, heroin, methamphetamines, marijuana, and other controlled substances. Prisoners report seeing other prisoners smoke crack cocaine or inject methamphetamines on a near-daily basis in the open areas of some cell blocks. It is common to smell burning wire or soda cans used to inject or smoke controlled substances.

50. The insufficient number of security staff to supervise and patrol the large prison population makes it nearly impossible to conduct adequate shakedowns and searches, which allows

dangerous contraband such as knives and shanks to be hidden throughout the prison facilities. Knives fashioned out of sheet metal, razors, and box cutters are plentiful. Cell phones and drugs are smuggled into the prison creating a volatile environment.

51. Tensions are further increased by conditions at the prison. The men at Donaldson are incarcerated in dilapidated buildings in need of repair.

52. When it rains, water leaks through the walls and ceilings, flooding entire cellblocks. Cardboard is stacked in the dormitories in an attempt to create a walkway through the inch or more of water on the floor. Rain falls into prisoners' cells, soaking their bunks. The men attempt to plug leaks with toilet paper and toothpaste. Failing that, they use garbage cans or cups to collect rainwater in their living areas.

53. The smell of sewage from the waste facility outside the prison often permeates the cell blocks.

54. Cockroaches often crawl across prisoners' food. The dining hall is damp, unsanitary, and infested with flies and roaches. Chips of paint and plaster fall down on prisoners while they eat. Prisoners have become sick due to eating tainted meat. Rats crawl on food trays used to serve meals.

55. Tensions are further exacerbated by the extreme heat during the summer months. The few fans in the dormitories do not provide sufficient relief from the heat. When prisoners are locked down in windowless, three-man cells, no air circulates and the heat becomes unbearable.

56. The tension and danger caused by forcing men to live in unsupervised dormitories and overcrowded cells where weapons are readily available has been made even worse by the dearth of treatment, educational, and vocational programs. Many men at Donaldson have nothing to do all day, every day. The lack of activities, exercise, and work for prisoners contributes to the already substantial risk of fights and assaults.

57. Critical incidents at Donaldson in 2008 and 2009 include, but are not limited to:

- a. 2/18/09: Eric Blankenship committed suicide by hanging.
- b. 2/2/09: A prisoner was stabbed.
- c. 1/28/09: Michael Mays was badly beaten by a group of prisoners and subsequently hospitalized.
- d. 12/24/08: Sahking Burke was stabbed 12 times and suffered two punctured lungs.
- e. 12/18/08: A prisoner was assaulted in a fight over a stolen cell phone.
- f. 12/5/08: A prisoner was assaulted.
- g. 11/17/08: A prisoner was badly beaten by other prisoners.

- h. 11/9/08: A prisoner was assaulted by another prisoner.
- i. 11/08: A prisoner was sodomized with a broomstick.
- j. 10/25/08: A prisoner was assaulted by another prisoner who blackened his eyes.
- k. 10/20/08: A prisoner was stabbed three times with an inmate-made knife.
- l. 10/17/08: A prisoner was stabbed.
- m. 10/17/08: A prisoner was stabbed.
- n. 10/9/08: A prisoner was stabbed.
- o. 10/6/08: A prisoner was stabbed.
- p. 10/6/08: A prisoner was stabbed 4-5 times in the segregation exercise yard by another prisoner who used a key to remove his handcuffs.
- q. 10/6/2008: Two prisoners were stabbed.
- r. 9/26/08: A prisoner was stabbed in the stomach while he slept.
- s. 9/25/08: A prisoner was tied up in a cell and beaten.
- t. 9/25/08: A prisoner was stabbed.
- u. 9/25/08: A prisoner was assaulted.
- v. 9/23/08: A prisoner was stabbed twice in the chest.
- w. 9/13/08: A prisoner was stabbed in the chest and shoulder.
- x. 9/10/08: A prisoner was stabbed.
- y. 9/7/08: A prisoner was attacked while he slept and was

- stabbed 11 times.
- z. 8/23/08: A prisoner stabbed another prisoner with a knife made from the metal frame of a window.
- aa. 8/11/08: Two prisoners stabbed each other in the segregation yard.
- bb. 7/27/08: A prisoner was slashed three times across the head with a knife and beaten with a mop handle.
- cc. 7/23/08: Charles Malec was slashed with a razor.
- dd. 7/22/08: A prisoner was stabbed.
- ee. 7/20/08: A prisoner was stabbed in the chest with a knife.
- ff. 6/23/08: A prisoner was stabbed multiple times and taken to the hospital.
- gg. 5/30/08: A prisoner was involved in an altercation with several inmates and was transported to hospital due to his injuries.
- hh. 5/27/08: A prisoner was stabbed repeatedly in the head in the southside dorm.
- ii. 5/27/08: A prisoner was stabbed in 4-block.
- jj. 5/18/08: John Hicks was attacked by a man with mental illness. He suffered a broken nose and eye socket. He was hospitalized, had surgery, and lost vision in his left eye.
- kk. 4/25/08: A prisoner was stabbed.

- ll. 4/16/08: A prisoner was stabbed and cut in the face with a box cutter.
- mm. 4/1/08: A prisoner was stabbed 5 times, once in the head and taken to the hospital.
- nn. 3/30/08: A prisoner was assaulted.
- oo. 3/20/08: A prisoner was assaulted.
- pp. 3/19/08: Four prisoners attacked a prisoner because of a debt.
- qq. 3/4/08: A prisoner was assaulted.
- rr. 3/4/08: Two prisoners were observed fighting.
- ss. 3/3/08: A prisoner was stabbed in the neck.
- tt. 3/08: A prisoner was stabbed in the hand while in his segregation cell by a prisoner who was able to exit his cell.
- uu. 3/08: A prisoner was stabbed in the back.
- vv. 2/15/08: A prisoner was repeatedly stabbed, hospitalized, and underwent a surgical procedure to drain fluid from his brain.
- ww. 2/9/08: A prisoner was assaulted.
- xx. 2/08: A prisoner was stabbed 14 times.
- yy. 2/08: A prisoner was stabbed in C/D block.
- zz. 1/29/08: A prisoner was stabbed.
- aaa. 1/25/08: A prisoner was stabbed and suffered minor injuries.

bbb. 1/22/08: A prisoner was stabbed by a prisoner wielding an ice pick.

58. In addition to these incidents, a number of sexual assaults have also been reported in the past year.

59. Despite the high level of violence, there are few security cameras in the prison. There are many areas, such as showers and corridors, that correctional officers cannot see from their stations. Investigations into violent incidents are often perfunctory or happen not at all.

60. Despite the high level of violence at Donaldson, persons who complain that they fear an assault are often ignored.

Unprotected by prison staff, prisoners resort to their own devices to protect themselves. Some prisoners have attacked innocent bystanders in order to be placed in a disciplinary segregation cell, away from general population.

61. Much of the violence at Donaldson goes unreported. Certain prisoners act as "doctors," sewing up prisoners' wounds.

62. Paradoxically, the chaotic environment at Donaldson contributes to prison overcrowding. Even those men who attempt to stay out of trouble at Donaldson find themselves being pulled into altercations. In an attempt to defend themselves, the men incur disciplinary reports for fighting. These disciplinary reports may cause the parole board to deny parole and extend incarceration.

63. For many years, defendants have known about and failed to take the necessary steps to abate the conditions challenged in this lawsuit, and their deliberate indifference to these conditions has resulted in the crisis that now threatens the basic health and safety of named plaintiffs and all members of the plaintiff class.

64. Proof of defendants' knowledge includes: (a) plaintiffs' counsel having placed defendants on notice by letters dated March 15, 2007, May 12, 2008, January 27, 2009, and February 12, 2009; (b) Institutional Incident Reports prepared by defendants' employees describing violent incidents in the last several years; (c) lawsuits filed by prisoners challenging conditions of confinement and lack of security; and (d) prisoners' oral assertions to prison administrators of lack of safety.

65. Defendants have further been made aware that the violent conditions at Donaldson have caused significant injuries and/or lasting disabilities to men at the prison because they had to provide medical care for people severely injured in the violence. Specifically, Defendants have knowledge of the following incidents:

- a. In August 2007, a prisoner was stabbed 5-6 times and suffered two collapsed lungs. He was taken to the hospital where he was placed on life support.

- b. In June 2007, David Carter was knifed in the chest with the blade barely missing his heart.
 - c. In May 2007, Dana Davis was nearly killed when another prisoner cut his throat and stabbed him over ten times with a foot-long knife. His lung collapsed. He was airlifted to UAB hospital.
 - d. In January 2007, a prisoner was stabbed. The knife punctured his liver and he suffered a collapsed lung.
 - e. In November 2006, a prisoner was stabbed by another prisoner, causing him to be confined to a wheelchair.
 - f. Leo Beverly was critically injured in November 2006 when a prisoner stabbed him in the legs, chest, back, and neck. His lung was pierced and he suffered nerve damage.
 - g. In August 2006, a prisoner was stabbed in the neck. He is now partially paralyzed.
 - h. In October 2005, a prisoner was stabbed in the eye and blinded.
66. The violence at Donaldson resulted in the death of Arthur Lee Scruggs in 2006. Mr. Scruggs was dragged into a cell, beaten, mutilated, and stabbed over 20 times.
67. On January 21, 2005, a mentally ill man, Charles Agee, was allegedly beaten to death by officers. See Bogus v. Alabama Dep't of Corrections, Civil Action No. 7:06-cv-1667-RDP (N.D. Ala.)

68. Defendants have had both objective and subjective knowledge of the high level of overcrowding and violence at Donaldson and of the risk presented to its inmates for years.
69. In spite of such knowledge, Defendants have failed to take reasonable steps to reduce the ongoing substantial risk of assault and serious injury presented to the men in custody at Donaldson.
70. The failure to act under these circumstances goes beyond gross negligence; the defendants have acted with a knowing, willful, unreasonable, and unconscionable disregard of the plaintiffs' rights, welfare, and well-being.
71. This Court has repeatedly found that overcrowding and understaffing inevitably may contribute to and exacerbates other impermissible prison conditions. This Court has explicitly and on multiple occasions ordered defendants to remedy the overcrowding that has been endemic in Alabama's prison system for the past 30 years. See e.g. Laube v. Haley, 234 F. Supp. 2d 1227 (M.D. Ala. 2002); Pugh v. Locke, 406 F. Supp. 318, 323 (M.D. Ala. 1976) ("overcrowding is primarily responsible for and exacerbates all the other ills of Alabama's penal system."). See also Graddick v. Newman, 453 U.S. 928, 934 (1981) ("Subject to judicial orders for nearly a decade, the State still failed to achieve compliance" with consent decree remedying conditions and overcrowding).

72. The courts have repeatedly made it clear that cost is not a defense to constitutional violations. "It should not need repeating that compliance with constitutional standards may not be frustrated by legislative inaction or failure to provide the necessary funds." Newman v. Alabama, 559 F.2d 283, 286 (5th Cir. 1977), rev'd in part on other grounds sub nom, Alabama v. Pugh, 438 U.S. 781 (1978). Prisons must meet constitutional standards irrespective of financial considerations. See Ancata v. Prison Health Servs., Inc., 769 F.2d 700, 705 (11th Cir. 1985) ("Lack of funds for facilities cannot justify an unconstitutional lack of competent medical care and treatment for inmates."). See also Moore v. Morgan, 922 F.2d 1553, 1557 n.4 (11th Cir. 1991); Gates v. Collier, 501 F.2d 1291, 1319-20 (5th Cir. 1974); Laube v. Haley, 234 F. Supp.2d 1227, 1252 (M.D. Ala. 2002).

VI. EXHAUSTION OF ADMINISTRATIVE REMEDIES

73. There are no administrative remedies within the Alabama Department of Corrections for named plaintiffs and other members of the plaintiff class to exhaust.

VII. CAUSES OF ACTION

74. Defendants' deliberate indifference to the substantial risk of serious physical violence to which plaintiffs are exposed, and to the conditions which serve to increase that risk, as described in paragraphs 1-11 and 26-72 violates plaintiffs' rights under the Eighth and Fourteenth Amendments to the United States Constitution, as enforced through 42 U.S.C. § 1983.

75. Defendants' deliberate indifference to the denial of plaintiffs' basic human needs of living space, ventilation, and sanitation, as described in paragraphs 1-11 and 26-72 violates plaintiffs' rights under the Eighth and Fourteenth Amendments to the United States Constitution, as enforced through 42 U.S.C. § 1983.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs respectfully pray that this Court:

1. Assume jurisdiction over this action;
2. Personally conduct an unannounced inspection of Donaldson Correctional Facility;
3. Grant plaintiffs a full trial and discovery in this matter;
4. Adjudge and declare that the acts and omissions of the defendants with regard to the class members violate the Eighth and Fourteenth Amendments to the United States

Constitution;

5. Order defendants to comply with the Constitution and enjoin defendants from subjecting plaintiffs to cruel and unusual punishment;
6. Award plaintiffs the costs of this lawsuit and reasonable attorney's fees; and
7. Order such additional relief as the Court may deem just and proper.

Respectfully submitted this 26th day of February, 2009.

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