



PC-LA-0004-0003

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA

JORGE ESTEVEZ, et al,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action NO. 88-01162
	)	Section K(5)
CHARLES C. FOTI, JR., et al,	)	
	)	
Defendants.	)	

MEMORANDUM IN SUPPORT OF MOTION TO AMEND  
COMPLAINT AND MOTION TO DISMISS STATE DEFENDANTS

MAY IT PLEASE THE COURT:

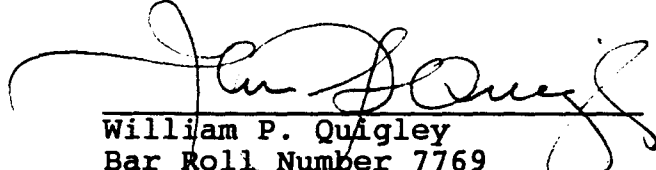
Counsel for plaintiffs have filed two motions before this court in order to place this matter in the proper posture for litigation.

This matter was originally filed as pro se litigation by the prisoners. The Tulane Law Clinic was appointed to represent the plaintiffs. The American Civil Liberties Union Prison Project and the Louisiana affiliate of the ACLU have also joined as counsel for plaintiffs.

The amended complaint is attached and explains itself. It represents a more specific, detailed listing of plaintiffs allegations and the constitutional basis for those allegations.

The motion to dismiss the state defendants is made because they are not the custodians of the plaintiffs and are not proper defendants.

Respectfully submitted,



William P. Quigley  
Bar Roll Number 7769  
901 Convention Center Blvd.  
Fulton Place, Suite 119  
New Orleans, LA 70130  
(504) 524-0016

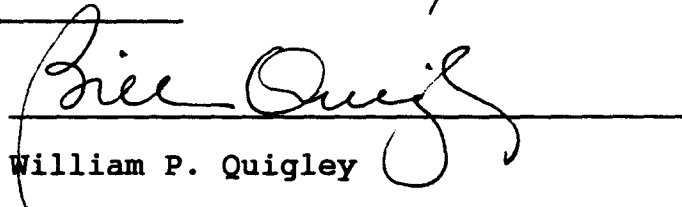
Claudia Wright  
ACLU National Prison Project  
1616 P Street, N.W.  
Suite 340  
Washington, D.C. 20036  
(202) 331-0500

Jane Johnson  
Bar Roll Number 7300  
Tulane Law Clinic  
7301 Freret  
New Orleans, LA 70118  
(504) 865-5153

CERTIFICATE SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by first class United States mail, properly addressed and postage prepaid on this 21 of June

1987



William P. Quigley