

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

**DANIEL GUMNS, MICHAEL
VIDEAU, TREVON WILEY,
IAN CAZENAVE, REGINALD
GEORGE, LIONEL TOLBERT,
OTTO BARRERA, KENTRELL
PARKER, MICHAEL ROBINSON,
JULIUS ALLEN, ERNEST ROGERS,
ALFOANSO GARNER, BRADLEY
WINTERS, KENDRICK WILSON, and
JAMES HUGHES, on behalf of themselves
and all similarly situated individuals,
Plaintiffs,**

VERSUS

**CIVIL ACTION NO. 3:20-cv-00231-
SDD-RLB**

**JOHN BEL EDWARDS, in his official
capacity as Governor of the State of
Louisiana; LOUISIANA DEPARTMENT
OF PUBLIC SAFETY & CORRECTIONS;
JAMES LEBLANC, in his official capacity
as Secretary of the Department of Safety and
Corrections; JOHN MORRISON, in his
official capacity as Medical Director of the
Department of Safety and Corrections;
LOUISIANA DEPARTMENT OF HEALTH;
and STEPHEN R. RUSSO, in his official
capacity as Interim Secretary of the
Louisiana Department of Health,
Defendants,**

CLASS ACTION

**MEMORANDUM IN OPPOSITION TO
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

NOW INTO COURT, through undersigned counsel, come Defendants, John Bel Edwards in his official capacity as Governor of the State of Louisiana ("Governor Edward"), Louisiana Department of Health ("LDH") and Stephen R. Russo in his official capacity as Interim secretary of LDH ("Russo") (collectively, Defendants), which oppose the plaintiffs' motion for class

certification. In support of this motion Defendants adopt and incorporate herein the opposition filed by the Louisiana Department of Public Safety & Corrections, James LeBlanc and John Morrison. (R. Doc. 59).

For all of these reasons, Defendants respectfully request that the Court deny the plaintiffs' Motion for Class Certification in this case.

Respectfully Submitted:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel by operation of the court's electronic filing system.

Baton Rouge, Louisiana, this 18th day of May, 2020.

/s/M. Brent Hicks

M. Brent Hicks