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MIDDLE DIST. OF LA.

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SIGN RM
RICHARD T. MARTIN
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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
BATON ROUGE DIVISION

ADVOCACY CENTER

PLAINTIFF

VS.

RICHARD STALDER, SECRETARY OF
THE LOUISIANA DEPARTMENT OF
PUBLIC SAFETY AND CORRECTIONS
AND KELLY WARD, WARDEN OF
THE DAVID WADE CORRECTIONAL
CENTER

DEFENDANTS

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CIVIL ACTION NO. 98-646

SECTION A

JUDGE Parke

MAGISTRATE JUDGE 3

MOTION FOR PRELIMINARY INJUNCTION

Plaintiff moves this Court to enter a Preliminary Injunction pursuant to Rule 65(a) of the Federal Rules of Civil Procedure:

(1) Requiring Defendants to immediately provide Plaintiff access to the medical and mental health records of William Ford;

(2) Requiring Defendants to cease and desist from violating Plaintiff's rights and the rights of individuals with mental illness under 42 U.S.C. §1983 pursuant to the PAIMI Act, specifically, 42 U.S.C. §10805 (a) (4) (A).

Plaintiff submits a memorandum in support of this motion. As shown by Plaintiff's complaint and the declaration of counsel submitted herewith, immediate and irreparable harm will result to Plaintiff and individuals with mental illness unless the relief prayed for is granted; it is likely that Plaintiff will succeed on the merits; and no



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DATE: 07/20/98

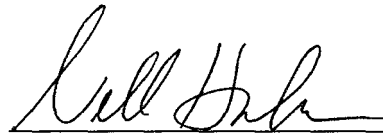
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harm to the Defendants will result if such relief is granted. The injunction requested will serve the public interest.

WHEREFORE, Plaintiff requests that this Court enter a preliminary injunction as prayed for above and in its complaint.

Respectfully submitted:

A handwritten signature in cursive script, appearing to read "Nell Hahn", is written over a horizontal line.

Nell Hahn, Bar No. 22406, T.A.
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