

SOUTH



3. The Court has jurisdiction over Plaintiff's request for declaratory and injunctive relief pursuant to 28 U.S.C. §§ 2201-2202.

#### PARTIES

4. Plaintiff Terry Lee Johnson is an inmate at Donaldson Correctional Facility.

5. Plaintiff Terry Lee Johnson is

is the warden of Donaldson Correctional Facility. He is responsible for the development and implementation of all biological practices of the prison and for ensuring that the prison operates in a manner that is consistent with the United States Constitution. He is sued in his official capacity.

#### CLASS ACTION

7. The Plaintiffs bring this suit on their own behalf as a class of all present and future Donaldson Correctional Facility inmates who are being or may be

Chess. The policy also prohibits inmates from receiving newspapers that are not from the local area, and from receiving magazines, catalogs, and other materials.

by this policy.

10. Warden Dees also implemented a policy

inmates from purchasing

reason

open

of a t

b. Prisoner Johnson was denied receipt of Part II Terry Lee  
from receiving book catalogs. Mr. Johnson previously relied  
on book catalogs to order approximately six books per month.  
The information provided by book catalogs is necessary

ators.

12. There are no ready, alternative means for the Plaintiff



xines is mided and mided

http://www...

20. The violation of the Plaintiffs' rights specified above may be remedied pursuant to 42 U.S.C. § 1983.

#### PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs pray that this Honorable Court grant the following relief:

1. Certify the Plaintiff class in this action;
2. Declare unconstitutional and unlawful the Defendant's practice of refusing to allow

any and all religious expression by the Defendant's students and employees on school property.

It is respectfully requested that the Court require the Defendant to pay

costs of this action, including reasonable attorney's fees, and to pay the

Plaintiffs' reasonable attorneys' fees and costs of this action.

Very truly yours,

\_\_\_\_\_  
Plaintiffs' Attorney

