

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

et al.

et al.

**MEMORANDUM IN SUPPORT OF PLAINTIFFS' EMERGENCY MOTION TO
RESTRAIN DEFENDANTS FROM TRANSFERRING COVID-19 CARRIERS TO
LOUISIANA STATE PENITENTIARY**

See, e.g.
Correctional

Louisiana plans to house local and state inmates with coronavirus at Angola and Allen

Id.

II. LSP Presents a Heightened Risk of Transmission of COVID-19

III. LSP Houses Thousands of Class Members Who Are at Particular Risk of Death If They Contract COVID-19

**IV. Defendants Intend to Transfer Inmates with COVID-19 to LSP from Facilities
in Other Parts of Louisiana**

Id.
Id.

Id. *supra*

V. Defendants Have Refused to Meet and Confer with Plaintiffs About the Transfer Plan

I. Plaintiffs Face a Substantial Threat of Irreparable Injury

Farmer v. Brennan
Martin
See supra

See supra
Humana, Inc. v. Jacobson
Id.
Martin

See supra
East v. Blue Cross & Blue Shield of La.
accord, e.g. Turner v. Epps

See, e.g. What Happens to People's Lungs When They Get Coronavirus?

II. Plaintiffs Have a Substantial Likelihood of Success on the Merits

See, e.g.
Doctors and Nurses

The Next Coronavirus Crisis Will Be a Shortage of

see also Janvey v. Alguire

Jolly v. Coughlin
Helling v. McKinney
See

III. The Remaining Factors Weigh Heavily in Favor of a Temporary Restraining Order and Preliminary Injunction

See Newman v. Alabama

cert. denied

Nken v. Holder

Jackson Women's Health Org. v. Currier

accord, e.g. June Medical Servs., LLC v. Caldwell

Awad v. Ziriax

Harris v. Johnson

**IV. The Court Should Immediately Enter a Temporary Restraining Order While It
Adjudicates This Motion**

CONCLUSION
