

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

VOICE OF THE EXPERIENCED, a membership organization on behalf of itself and its members; and **MYRON SMITH, DAMARIS JACKSON, NATE WALKER, DARRIUS WILLIAMS, KEVIAS HICKS, JOSEPH GUILLORY, KENDRICK STEVENSON**, and **ALVIN WILLIAMS**, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

JAMES LEBLANC, in his official capacity as Secretary of the Louisiana Department of Public Safety and Corrections; **TIMOTHY HOOPER**, in his official capacity as Warden of Louisiana State Penitentiary; **MISTY STAGG**, in her official capacity as Director of Prison Enterprises, Inc.; the **LOUISIANA DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS**; and **PRISON ENTERPRISES, INC.**

Defendants.

Civil Action No.: 3:23-cv-1304-BAJ-EWD

**PLAINTIFFS' APPLICATION FOR A PRELIMINARY INJUNCTION AND
TEMPORARY RESTRAINING ORDER**

NOW INTO COURT, come Plaintiffs Voice of the Experienced ("VOTE") and Myron Smith, Damaris Jackson, Nate Walker, Darrius Williams, Kevias Hicks, Joseph Guillory, Kendrick Stevenson, and Alvin Williams, by and through their attorneys, by way of this Application for Temporary Restraining Order and Preliminary Injunction, who move and request of this Court to issue a temporary restraining order and preliminary injunction against Defendants James LeBlanc, in his official capacity as Secretary of the Louisiana Department of

Public Safety and Corrections; Timothy Hooper, in his official capacity as Warden of Louisiana State Penitentiary; Misty Stagg, in her official capacity as Director of Prison Enterprises, Inc.; the Louisiana Department of Public Safety & Corrections; and Prison Enterprises, Inc., all as set forth in the accompanying memorandum.

Dated: May 13, 2024

/s/ Lydia Wright

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