

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

J.H., BY AND THROUGH HIS  
MOTHER AND NEXT FRIEND, N.H.;  
I.B., BY AND THROUGH HIS PARENTS  
AND NEXT FRIENDS, A.B. AND I.B.,  
ON BEHALF OF THEMSELVES AND  
ALL OTHERS SIMILARLY SITUATED

CIVIL ACTION NUMBER  
3:20-cv-00293-JWD-EWD

VERSUS

JOHN BEL EDWARDS, IN HIS  
OFFICIAL CAPACITY AS GOVERNOR  
OF LOUISIANA; THE LOUISIANA  
OFFICE OF JUVENILE JUSTICE;  
EDWARD DUSTIN BICKHAM, IN HIS  
OFFICIAL CAPACITY AS INTERIM  
DEPUTY SECRETARY OF THE  
LOUISIANA OFFICE OF JUVENILE  
JUSTICE; JAMES WOODS, IN HIS  
OFFICIAL CAPACITY AS THE  
DIRECTOR OF THE ACADIANA  
CENTER FOR YOUTH; SHANNON  
MATTHEWS, IN HER OFFICIAL  
CAPACITY AS THE DIRECTOR OF  
THE BRIDGE CITY CENTER FOR  
YOUTH; SHAWN HERBERT, IN HIS  
OFFICIAL CAPACITY AS THE  
DIRECTOR OF THE SWANSON  
CENTER FOR YOUTH AT MONROE;  
AND RODNEY WARD, IN HIS  
OFFICIAL CAPACITY AS THE  
DEPUTY DIRECTOR OF THE  
SWANSON CENTER FOR YOUTH AT  
COLUMBIA

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GOVERNOR JOHN BEL EDWARDS'S ANSWER TO  
PLAINTIFFS' CLASS ACTION COMPLAINT FOR DECLARATORY AND  
INJUNCTIVE RELIEF AND PETITION FOR WRIT OF HABEAS CORPUS

NOW INTO COURT, through undersigned counsel, comes Defendant, JOHN BEL  
EDWARDS, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF THE STATE OF

**LOUISIANA**, who hereby answers plaintiffs’ Class Action Complaint for Declaratory and Injunctive Relief and Petition for Writ of Habeas Corpus (Rec Doc 1) (hereinafter “Complaint”) filed by Plaintiffs J.H., by and through his mother and next friend N.H.; I.B., by and through his parents and next friends, A.B. and I.B., on behalf of themselves and all others similarly situated. Defendant adopts and incorporates herein the Answer filed today by The Louisiana Office of Juvenile Justice [Rec Doc 98], along with all affirmative defenses, objections, admissions, and reservations therein, with the exception of Paragraph 17 therein. Further answering, Defendant Governor Edwards provides the following:

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#### **PARTIES**

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17. Defendant Governor John Bel Edwards admits the allegations contained in the first sentence of Paragraph 17 of the Complaint. In response to the second and third sentences of Paragraph 17 of the Complaint, Defendant Governor Edwards states that Article IV, § 5 of the Louisiana Constitution and Louisiana R.S. § 29.724(D)(1) speak for themselves, and Defendant Governor Edwards objects to the allegations to the extent they call for a conclusion of law. Defendant Governor Edwards refers all questions of law to the Court. To the extent that a response is deemed required, the Governor admits that he is the chief executive of the state of Louisiana and has a solemn duty to implement his discretion to protect the constitution and laws of the United States and the constitution and laws of the state of Louisiana, and to faithfully and impartially discharge and perform all the duties incumbent upon him as Governor. Defendant Governor Edwards admits the allegations contained in the fourth sentence of Paragraph 17 of the Complaint. Defendant Governor Edwards denies the allegations contained in the fifth and sixth sentences of

Paragraph 17 of the Complaint. Defendant Governor Edwards admits the seventh sentence of Paragraph 17 of the Complaint. Defendant Governor Edwards denies any remaining allegations contained in Paragraph 17 of the Complaint.

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By Attorneys:

*s/ John C. Walsh*

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*Attorney for JOHN BEL EDWARDS*

**GOVERNOR**

### **CERTIFICATE OF SERVICE**

I hereby certify that, on July 7, 2020, I electronically filed the forgoing with the Clerk of Court by using the CM/EMF system, which will send a notice of electronic filing to all counsel of record.

*s/ John C. Walsh*

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**JOHN C. WALSH**