

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

MICHAEL AMOS, *ET AL.*

PLAINTIFFS

V.

CASE NO. 4:20-CV-007-DMB-JMV

TOMMY TAYLOR, *ET AL.*

DEFENDANTS

**PLAINTIFFS' SUPPLEMENTAL EMERGENCY MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

COMES NOW Michael Amos, Pitrell Brister, Antonio Davis, Willie Friend, Charles Gayles, Daniel Guthrie, Jonathan J. Ham, Desmond Hardy, Billy James, Jr., Justin James, Quenten Johnson, Deaunte Lewis, Larry Maxwell, Terrance McKinney, Derrick Pam, Brandon Robertson, Kuriaki Riley, Derrick Rogers, Tyree Ross, H.D. Alexander Scott, Deangelo Taylor, Lemartine Taylor, Conti Tillis, Demarcus Timmons, Carlos Varnado, Phillip DeCarlos Webster, Adrian Willard, and Curtis Wilson, Caleb Buckner, William Green, Aric Johnson, Ivery Moore, and Kevin Thomas, plaintiffs herein, by and through undersigned counsel, and pursuant to Rule 65 of the Federal Rules of Civil Procedure, respectfully request that this Court grant their Motion for Temporary and Preliminary Injunction and the specific relief described below:

Regarding **Aric Johnson in Unit 29, Building F, Zone A**, Defendants should be ordered to remedy the following unconstitutional conditions:

1. Within five (5) days, Johnson must see a medical doctor to assess his high blood pressure;
2. Within twenty-four hours, refill Johnson's high blood pressure medication;
3. Within five (5) days, repair the roof and other avenues of water intrusion in Johnson's immediate living area;

4. Within five (5) days, repair the exposed electrical wires in Johnson's shower;
5. Within five (5) days, repair the toilets and urinals in Johnson's zone;
6. Within five (5) days, repair the air conditioning in Johnson's zone.

Regarding **Phillip Webster in Unit 29, Building F, Zone A**, Defendants should be ordered to remedy the following unconstitutional conditions:

1. Within five (5) days, treat effectively the infestation of rats and cockroaches in Webster's immediate living area;
2. Within five (5) days, repair the roof and other avenues of water intrusion in Webster's immediate living area;
3. Within five (5) days, repair the air conditioning in Webster's zone;
4. Within five (5) days, Webster must see an ophthalmologist to treat his burning eyes.

Regarding **Kuriaki Riley in Unit 30, Building B, Zone A**, Defendants should be ordered to remedy the following unconstitutional conditions:

1. Within five (5) days, Riley should see a psychiatrist to assess his mental health and develop a long-term mental health plan including periodic follow up visits, as medically indicated;
2. Within five (5) days, Riley should see a medical doctor to assess his high blood pressure;
3. Within twenty-four hours, refill Riley's high blood pressure medication;
4. Within five (5) days, restore the drinking water in Riley's zone to acceptable standards.

Regarding **Justin James in Unit 30, Building A, Zone B**, Defendants should be ordered to remedy the following unconstitutional conditions:

1. Within five (5) days, treat effectively the infestation of rats and cockroaches in James' immediate living area;
2. Within five (5) days, repair the roof and other avenues of water intrusion in James' immediate living area;
3. Within five (5) days, remediate the mold in the shower in James' zone;
4. Within five (5) days, repair the air conditioning in James' zone;
5. Within five (5) days, repair the air conditioning in James' zone;
6. Within five (5) days, arrange for James to have the required one hour of recreation daily.

In support of its motion, Plaintiffs respectfully submit their accompanying Supplemental Memorandum Brief and the following exhibits:

EXHIBIT A: Eldon Vail Expert Report and Addendum
EXHIBIT B: Dr. Marc Stern Expert Report and Addendum
EXHIBIT C: Craig Haney, Ph.D., J.D. Expert Report
EXHIBIT D: Debra Graham Expert Report and Addendum
EXHIBIT E: Madeleine LaMarre Expert Report
EXHIBIT F: Frank Edwards Expert Report
EXHIBIT G: Plaintiffs' Affirmation Compilation
EXHIBIT H: Plaintiffs' Photograph Submission
EXHIBIT I: Supplemental Declaration of Phillip Webster (June 5, 2020)
EXHIBIT J: Supplemental Declaration of Aric Johnson (June 5, 2020)
EXHIBIT K: Supplemental Declaration of Justin James (June 5, 2020)
EXHIBIT L: Supplemental Declaration of Kuriaki Riley (June 5, 2020)
EXHIBIT M: Sworn COVID Questionnaire Compilation
EXHIBIT N: Vail's Additional Expert Source Material
EXHIBIT O: Stern's Additional Expert Source Material
EXHIBIT P: Haney's Additional Expert Source Material
EXHIBIT Q: Graham's Additional Expert Source Material
EXHIBIT R: LaMarre's Additional Expert Source Material
EXHIBIT S: Edwards' Additional Expert Source Material

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that this Court grant their Emergency Motion for Temporary Restraining Order and Preliminary Injunction and for any other relief the Court deems appropriate.

This the 8th day of June, 2020.

Respectfully submitted,

/s/ Marcy B. Croft
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 8, 2020, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the Court's electronic filing system.

/s/ Marcy B. Croft
Marcy B. Croft (MS Bar #10864)