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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

KATIE ROBINSON, et al.,

Plaintiffs,

v.

RAÚL LABRADOR, et al.,

Defendants.

Case No. 1:24-cv-00306-DCN

**PLAINTIFFS' MOTION TO
AMEND CLASS ACTION
COMPLAINT**

Plaintiffs move for leave to file this Second Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(2). This second amendment is filed to reflect the withdrawal of Rose Mills as a class representative due to her release from incarceration (*see* dks. 149, 150) and the addition of Izaiha Singer as a class representative. Defense Counsel for State Defendants and Centurion have

expressed that they are not opposed to Plaintiffs filing this amendment, though they do not thereby admit to the allegations contained therein.

This motion is supported by the attached memorandum of law in support. Also attached is the proposed Second Amended Class Action Complaint and a redlined version of the same. Plaintiffs respectfully request that the court grant this motion and allow Plaintiffs to substitute Izaiha Singer as class representative.

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September 23, 2025

Respectfully submitted,

/s/ Emily Myrei Croston

Attorney for Plaintiffs