

STATE OF INDIANA)
)
COUNTY OF MARION)

SS:

IN THE MARION SUPERIOR COURT
CIVIL DIVISION, ROOM NO. 1
CAUSE NO. 49-D018901-CP0097

LINDBERG COE, JAMES JONES,)
JOHN T. ABRAMS, and)
DAVID HENDLEY,)
On behalf of themselves and)
all others similarly)
situated,)

Plaintiffs,)

v.)

CENTER TOWNSHIP OF MARION)
COUNTY, INDIANA, and)
WILLIAM R. SMITH, in his)
official capacity as Center)
Township Trustee,)

Defendants.)

FILED

MAR 17 1989

Gayle J. Mowery
CLERK

SUPPLEMENTAL MEMORANDUM IN SUPPORT
OF MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs submit the following portion of "Homelessness in America: A Litigation Memorandum for Legal Services Advocates," which summarizes some of the national litigation on behalf of the homeless. This Memorandum was prepared by the Legal Services Advocates Homeless Task Force in 1986 and its principal author is James A. Barrett of Pisgah Legal Services in North Carolina.

Plaintiffs submit this Supplemental Memorandum for the purpose of illustrating to the Court that the use of state statutes and constitutional provisions to establish a right to emergency shelter is not unique to Indiana or to this case.

Respectfully submitted,

Richard A. Waples
Richard A. Waples

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Fran Quigley
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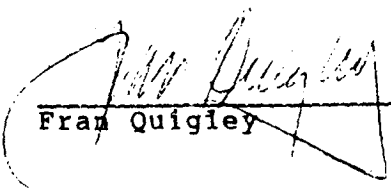
HENRY J. PRICE & ASSOCIATES, P.C.
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the foregoing was served upon the following by hand-delivery, this 17th day of March, 1989, addressed to the following:

Allen N. Smith, Jr.
MOORE, SMITH & BRYANT
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