

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

A.A., by and through his mother, P.A.;	* CIVIL ACTION NO.: 19-CV-770-BAJ-SDJ
B.B., by and through her mother, P.B.;	* JUDGE BRIAN A. JACKSON
C.C., by and through her mother, P.C.;	* MAGISTRATE SCOTT D. JOHNSON
D.D., by and through his mother, P.D.;	* CLASS ACTION
E.E., by and through his mother, P.E., and	* v.
F.F., by and through her mother, P.F.	* REBEKAH GEE in her official capacity, as
<i>Plaintiffs,</i>	* Secretary of the Louisiana Department of
	* Health, and the LOUISIANA DEPARTMENT
	* OF HEALTH
	* <i>Defendants.</i>
	* *****

PLAINTIFFS’ RENEWED MOTION FOR CLASS CERTIFICATION

In accordance with the Court’s Order, dated August 28, 2020 (Rec. Doc. 50), and pursuant to Federal Rules of Civil Procedure 23(a) and 23(b), Plaintiffs A.A., B.B., C.C., D.D., E.E., and F.F. (“Plaintiffs”) and their parents, P.A., P.B., P.C., P.D., P.E., and P.F., respectfully request this Court enter an order certifying this case as a class action, with the class defined as:

All Medicaid-eligible youth under the age of 21 in the State of Louisiana who are diagnosed with a mental illness or condition, not attributable to an intellectual or developmental disability, and who are eligible for, but not receiving, necessary intensive home and community based (mental health) services.

This Motion is supported by a Memorandum of Law in Support of Plaintiffs’ Renewed Motion for Class Certification, which Plaintiffs have filed concurrently, and by the attached declarations and exhibits thereto.

Undersigned counsel also moves the Court to grant this motion and appoint them as Class

Counsel pursuant to Fed. R. Civ. P. Rule 23(g).

Respectfully submitted this 18th day of September, 2020,

A.A., B.B., C.C., D.D., E.E., and F.F.
By and through their parents

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