

2-25-15

MEMORANDUM OF LAW in support of  
< Plaintiff's motion for a Temporary Restraining  
Order and Preliminary Injunction >

The men of A2 pod 2 have not had a simultaneous linen/blank exchange in over 10 weeks. On Monday, February 23, linen and blues were exchanged. On Tuesday, February 24, a "shakedown" crew sent by Facility Administration confiscated our clean blues, threw our clean sheets and towels on the filthy floors and walked on them.

As kitchen workers, we supply a valid service to the PPS, with diligence. More often than not, we are locked into our cells after work and denied showers, contaminating bedding and our cracked living spaces. These actions have created a hazardous conditions that may lead to a tragic event and violates the "Cruel and unusual punishment" clause of the Eight Amendment to the United States Constitution. These actions also further illustrate a policy of deliberate indifference to our overall health and safety while in custody here.

This Administration exhibits a consistent attitude of systematic injustice towards prisoners and, "as a matter of law, the continuing deprivation of constitutional rights constitutes irreparable harm." (Elrod v. Burns 427 U.S. 347, 373, 96 S.Ct. 2673 (1976)) We will not continue to work in filthy uniforms and will seek a temporary restraining order and preliminary injunction barring "triple celling" and mandating a scheduled, documented (by signature) linen/blank exchange.

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Antar Curren