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IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF LOUISIANA

DEC 19 PM 4:38

SUSAN HILL,

et al.

Plaintiffs,

v.

STATE OF LOUISIANA

LOUISIANA DEPARTMENT OF NATURAL  
RESOURCES

BOBBY JINDAL, Governor of the State of  
Louisiana, in his official capacity and in his  
individual capacity

et. al

Defendants

CIVIL ACTION

NO. 08-426-RET-DLD

BY DEPUTY CLERK

**MOTION TO EXTEND TIME FOR SERVICE**

Petitioner, SUSAN HILL respectfully requests a second extension of time for service. I have good cause to justify this request. My request for extension of time for service is because of harm and injury caused by defendants' actions. My inability to serve defendants as of this date (December 19, 2008) has been directly caused by defendants' actions. Defendants have engaged

in obstructive, harassing, bad faith, and other misconduct that has caused me to need an additional extension of time for service.

Defendants' actions caused me to suffer from a serious health condition. Defendants' actions caused my daughter to suffer from a serious health condition that required that she be taken care of by me as her mother and primary caregiver. I was taking care of my daughter as best as I could as we were both suffering from serious health conditions that defendants' were on notice that they were causing. At a certain time, I was increasingly more ill because of defendants ongoing and continuing actions and my daughter was removed from my care and flown out of state to be taken care of by relatives.

Through this time of defendants' actions subjecting us to ongoing and continuing violations and deprivations of our constitutional and statutory rights, multiple demands were made to defendants to stop the harm and injury they are causing; however, defendants have continued to cause harm and injury.

On notice of the filing of this Federal lawsuit as well as on notice of the harm and injury caused by their actions, defendants continued to engage in actions causing harm and injury and have failed to stop the ongoing and continuing violations and deprivations of our constitutional and statutory rights.

We suffer harm and injury because of defendants deliberate indifference to our constitutional and statutory rights; defendants' actions caused both of our serious health conditions to become

increasingly exacerbated and worsened through defendants ongoing and continuing violations.

I believe I have provided good cause for an extension of time for service. Of consequence, defendants at all times have been on notice that their ongoing and continuing actions have caused mental, emotional, and physical harm. Defendants are also aware that I have disclosed defendants' misconduct to a media contact and to law enforcement. As I previously indicated, I will file an amended complaint prior to service to delineate fully all of defendants' actions.

Respectfully submitted,

By: 

Plaintiff, SUSAN HILL, Pro Se

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