

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<p>INCLUSIVE LOUISIANA; MOUNT TRIUMPH BAPTIST CHURCH; RISE ST. JAMES, by and through their members <i>Plaintiffs,</i></p> <p>vs.</p> <p>ST. JAMES PARISH; ST. JAMES PARISH COUNCIL; ST. JAMES PARISH PLANNING COMMISSION, <i>Defendants.</i></p>	<p>Civil Action No. 2:23-cv-00987 Section J Judge Carl Barbier Magistrate Judge Janis van Meerveld</p>
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**PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER WITH  
NOTICE**

In accordance with Fed. R. Civ. P. 65(b), Plaintiffs Inclusive Louisiana, Mount Triumph Baptist Church, and RISE St. James respectfully ask this Honorable Court to grant a temporary restraining order (“TRO”) preserving the status quo and preventing irreparable harm to Plaintiffs. Specifically, Plaintiffs ask this court to issue a TRO enjoining St. James Parish from taking any further action to implement and/or give effect to its recently-passed Ordinance No. 26-08, and enjoining any efforts which seek to redesignate land in Romeville from “Agricultural” to “Industrial.” This Motion is supported by declarations and evidence attached as exhibits, Plaintiffs’ Memorandum of Law in Support, as well Plaintiffs’ Second Amended Complaint. Dkt. No. 104. Counsel for St. James Parish have stated that the Parish opposes this motion and intends to file an opposition as soon as possible.

On June 17, 2026, the St. James Parish voted to pass ordinance 26-08 (“Ordinance”),<sup>1</sup> that is just the latest in a discriminatory and unlawful pattern of land use decisions, and which would further the Parish government’s unrelenting effort to erase historic Black communities. This Ordinance imperils a community in Romeville formed by freedpeople soon after emancipation—a community that, against all odds, was able to pool their resources together to buy land and build a church, a cemetery, and homes that have remained until today. Declaration of Laura Blokker (hereinafter “Blokker Decl.”), ¶¶ 15, 18, 20-37. The Ordinance would redesignate into “Industrial” at least one,<sup>2</sup> and likely two,<sup>3</sup> historic cemeteries of enslaved people and freedpeople, and it would also redesignate as “Industrial” the Estate of Harriet Jones, a property acquired by a formerly-enslaved woman soon after emancipation, that has remained in her family for over 150 years. *See* Declaration of Gail LeBoeuf and Barbara Washington (hereinafter “LeBoeuf and Washington Decl.”), ¶¶ 6, 20-22. For centuries, the land at issue has been used primarily for agricultural and residential purposes and was recognized and therefore designated as “Agricultural” in the Parish’s 2014 Land Use Plan. Now, through this special Ordinance, the Parish declares this land as “Industrial” outside of any comprehensive land use planning process, and announces that this historic monument will be erased by industrial expansion.

Romeville is also home to Inclusive Louisiana’s Community Hub, Romeville Public Park, and Inclusive Louisiana co-founder Ms. Barbara Washington’s residence. *Id.* ¶¶ 7, 33-34.

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<sup>1</sup> *See* Ordinance attached hereto to Declaration of Astha Sharma Pokharel, annexed hereto (hereinafter “Sharma Pokharel Decl.”), Ex. 16.

<sup>2</sup> Pleasant Hill Cemetery, *see* Proposed Ordinance attached to Sharma Pokharel Decl., Ex. 1; Mem. in Supp. of TRO at 7, Fig. 2.

<sup>3</sup> Colomb Plantation Cemetery. *Id.*

While the Ordinance does not formally redesignate those properties, it allows industrial plants to fully encircle them. Mem. in Supp. of TRO at 7, Fig. 2.

This Court ruled on February 9, 2026, that Plaintiffs had plausibly alleged a pattern and practice of unlawful land use decisions that “quite literally originated in slavery.” *Inclusive Louisiana v. St. James Par.*, No. CV 23-987, 2026 WL 352793, at \*7 (E.D. La. Feb. 9, 2026). This latest planned action by the Parish is a quintessential example of that pattern and practice.

Plaintiffs move for a TRO based on three claims: Plaintiffs’ right to be free of any badge or incident of slavery under the Thirteenth Amendment; Plaintiffs’ rights to “preserve, foster, and promote their respective historic linguistic and cultural origins” under the Louisiana Constitution, La. Const. art. XII, § 4; and Plaintiff Mount Triumph Baptist Church’s right to nondiscrimination under the Religious Land Use and Institutionalized Persons Act, 42 U.S.C. §§ 2000cc, *et seq.* As set out more fully in Plaintiffs’ Memorandum of Law in Support of this Motion, they are likely to succeed on those claims; the relief Plaintiffs seek is necessary to maintain the status quo and prevent immediate and irreparable harm: namely, the constitutional and stigmatic harms that will occur when the Parish announces the erasure of historic communities by industry. The balance of equities weighs sharply in Plaintiffs’ favor. And for reasons described in the Memorandum of Law, this Court should set the bond at zero dollars.

Accordingly, Plaintiffs respectfully request that the Court issue the requested temporary restraining order immediately.

#### **PRAYER FOR RELIEF**

1. An order enjoining St. James Parish from taking any further action to implement and/or give effect to its recently-passed Ordinance No. 26-08, and enjoining any

efforts which seek to redesignate land in Romeville from “Agricultural” to “Industrial.”

2. An order that Plaintiffs’ bond or other security be set at zero dollars, and
3. Such other and further relief as the Court deems just and proper.

WHEREFORE, it is respectfully requested that this Court grant this application for a temporary restraining order.

Respectfully submitted on June 18, 2026

/s/ Clara Potter

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**CERTIFICATION OF NOTICE TO OPPOSING COUNSEL PURSUANT TO FED. R.  
CIV. P. 65(b)(1)(B)**

Pursuant to Fed. R. Civ. P. 65(b)(1)(B), I certify that on June 18, 2026, counsel for RISE St. James, Clara Potter, and I called counsel for the Parish and left a voicemail to notify the Parish about this pleading. Soon after, Counsel for the Parish responded by email as follows: “We received your voice mail regarding your intention to seek a TRO this afternoon in the pending federal matter. Please note that we oppose this request and intend to file an opposition as soon as possible.”

I have caused to be served via ECF system a copy of this pleading and associated documents on the Defendant through their counsel of record, as well as emailed the documents to counsel at the following addresses:

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