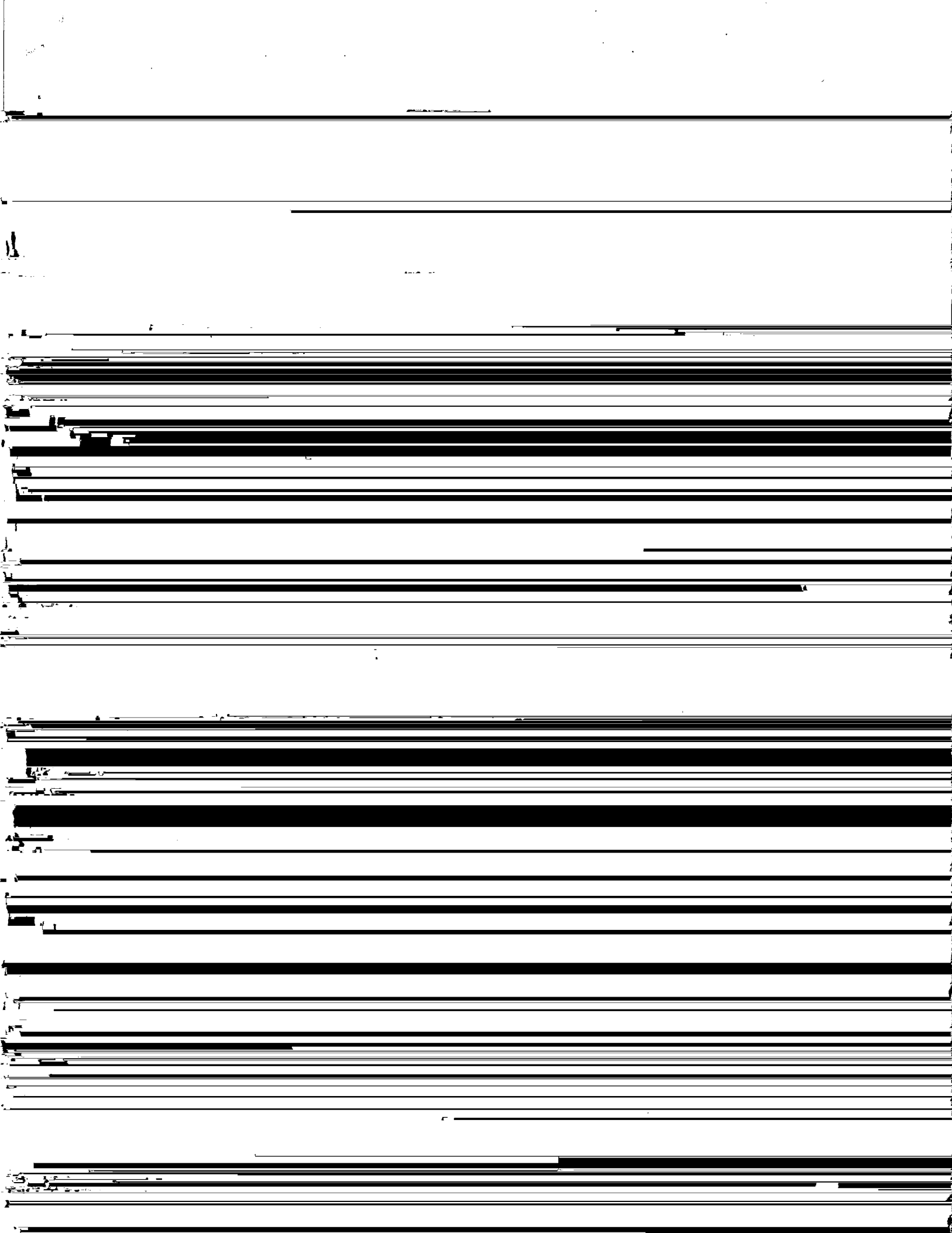


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION

CORRINE GARNER, on behalf )  
of herself, the six minor )  
children of Loyal Garner, )  
Jr., and the estate of Loyal )  
Garner, Jr.; and )

LOYAL GARNER, SR. and SARAH )  
LEE GARNER, the parents of )  
Loyal Garner, Jr. )



STATEMENT OF FACTS

9. During the evening of Christmas Day, December 25, 1997,

Loyal Garner, Jr., a black resident of Florien, Louisiana, was taken into custody on minor criminal charges by local law enforcement officials in Sabine County, Texas.

10. While in custody at the Sabine County Jail in Hemphill,

Texas, Garner was dragged from his cell and savagely beaten by defendants Ladner, Hyden, and Horton.

11. After he was beaten and severely injured, Garner was dragged back to his cell and left to suffer throughout the night of December 25 and the morning of December 26.

needed medical attention after he was beaten, yet they failed to provide it to him.

13. On December 27, Garner died as a result of the injuries.

17. The actions of defendants Ladner, Hyden, and Horton in

keeping Garner and in failing to provide him with medical care

18. The actions of defendants Ladner, Hyden, and Horton in

24. By the duration and frequency of the incidents of

City of Hemphill had constructive knowledge of the custom of excessive force and brutality used by employees of the City of Hemphill police department.

Loyal Garner, Jr., lost substantial future earnings.

PRAYER FOR RELIEF

WHEREFORE, plaintiff prays that this Court:

1. Award plaintiffs compensatory and punitive damages in an amount in excess of \$10,000, exclusive of interest and costs, against the defendants.

2. Grant plaintiffs such other relief as the Court deems necessary and just.

CERTIFICATE OF SERVICE

[REDACTED]

[REDACTED]

[REDACTED]