

STATE OF LOUISIANA
STATE POLICE COMMISSION

IN RE: CARL CAVALIER

VERSUS

LOUISIANA DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS, OFFICE OF
STATE POLICE

DOCKET NUMBER: 21-261-T

DOCKET NUMBER: 21-256-D

DOCKET NUMBER: 21-257-S

MOTION TO WITHDRAW AS COUNSEL OF RECORD

NOW INTO COURT, through undersigned counsel comes Jill L. Craft, Trial Attorney, W. Brett Conrad, Jr., and the Law Offices of Jill L. Craft, Attorney at Law, LLC, who respectfully move this Honorable Court for issuance of an Order permitting them to withdraw as counsel of record for the plaintiff, Carl Cavalier, in the above-referenced matters, Docket Numbers 21-261-T, 21-256-D, 21-257-S, for the following reasons to-wit:

1.

Counsel communicated to plaintiff their desire to withdraw as Trial Attorney and counsel of record for the Plaintiff in this matter as of October 13, 2022, based upon an irreconcilable conflict between counsel and the plaintiff. Counsel have communicated all pending deadlines to the Plaintiff. Counsel have fulfilled their obligations under the Rules of Professional Conduct.

2.

Plaintiff's current address is: 248 Ciera Drive, Houma, Louisiana 70364 and his telephone number is: (504) 316-0351.

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3.

Counsel contacted counsel for the defense who has not responded to the request to withdraw.

4.

No party will be prejudiced. Plaintiff has been advised regarding obtaining replacement counsel. Attached hereto and made apart hereof is Certification of Counsel. Counsel additionally shows that a copy of the Motion and Proposed Order were sent to the Plaintiff and opposing counsel prior to filing this Motion.

WHEREFORE, Jill L. Craft, Trial Attorney, W. Brett Conrad, Jr., and the Law Offices of Jill L. Craft, Attorney at Law, LLC pray after due proceedings are had that an Order issue herein permitting them to withdraw as counsel of record for the Plaintiff, Carl Cavalier, and that Plaintiff be afforded sufficient time in order to retain replacement counsel.

RESPECTFULLY SUBMITTED,

By: _____
Jill L. Craft, T.A. Bar Roll No. 20922
Attorney at Law, LLC
W. Brett Conrad, Jr., Bar Roll No. 37639
329 Saint Ferdinand Street
Baton Rouge, Louisiana 70816
Telephone: (225) 663-2612
Fax: (225) 663-2613
jcraft@craftlaw.net;bconrad@craftlaw.net

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17 day of October, 2022, a copy of the above and foregoing Motion to Withdraw as Counsel of Record has been served by email and First Class United mail, properly addressed with sufficient postage affixed thereto upon all counsel of record and a copy has also been sent via certified mail to Plaintiff at his home address of 248 Ciera Drive, Houma, Louisiana 70364 and by email to his email karlcavalier@yahoo.com.

Baton Rouge, Louisiana, this 17 day of October, 2022.

Jill L. Craft

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CERTIFICATION BY COUNSEL

I hereby certify that I notified the Plaintiff, Carl Cavalier, of our intention to withdraw as counsel of record, and further, notified Plaintiff of all deadlines and pending court appearances and the Conditional Dismissal issued by the Court following confirmation of settlement on the record at Settlement Conference. Due to Attorney-Client privilege, I am not at liberty to disclose the actual contents of the correspondence sent to Mr. Cavalier. A hard copy of this Motion was emailed to the Plaintiff via email at karlcavalier@yahoo.com and mailed to his home address of 248 Ciera Drive, Houma, Louisiana 70364, by both regular and certified mail on October 17, 2022.

Baton Rouge, Louisiana, this 17 day of October, 2022.

↓
on October 13,
2022

Jill L. Craft
La. Bar Roll No. 20922

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