

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

CARL CAVALIER

CIVIL ACTION NO: 3:21-cv-00656

VERSUS

JUDGE: JOHN W. deGRAVELLES

**STATE OF LOUISIANA:
DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONS: PUBLIC SAFETY
SERVICES; OFFICE OF STATE POLICE;**

**MAGISTRATE JUDGE: RICHARD L.
BOURGEOIS, JR.**

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, for the following reasons to-wit:

1.

Counsel communicated to plaintiff their desire to withdraw as Trial Attorney and counsel of record for the Plaintiffs 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, including that following the Settlement Conference and entry of the agreement on the record of these proceedings, that a Conditional Order of Dismissal has been entered. Counsel have fulfilled their obligations under the Rules of Professional Conduct and pursuant to Local Rule 83(b)(13).

2.

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

3.

Counsel contacted counsel for the defense who has objection to the request to withdraw asserting she believes the presence of counsel may be necessary in order to conclude this matter in accordance with the parties' settlement.

4.

No party will be prejudiced. This matter was conditionally dismissed pursuant to an Order of Conditional Dismissal entered October 7, 2022, following a Settlement Conference with the Magistrate-Judge. Plaintiff has been advised regarding obtaining replacement counsel. Attached hereto and made apart hereof is Certification of Counsel pursuant to Local Rule 83(b)(13). 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: _____s/Jill L. Craft_____
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
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jcraft@craftlaw.net;bconrad@craftlaw.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 14th day of October, 2022, a copy of the above and foregoing Motion to Withdraw as Counsel of Record has been filed with the Clerk of Court, using the CM/ECF System. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system. 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 14th day of October, 2022.

_____ s/ Jill L. Craft _____

Jill L. Craft

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 on October 13, 2022, and again emailed and mailed to his home address of 248 Ciera Drive, Houma, Louisiana 70364, by both regular and certified mail on October 14, 2022.

Baton Rouge, Louisiana, this 14th day of October, 2022.

s/Jill L. Craft

Jill L. Craft

La. Bar Roll No. 20922

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**MAGISTRATE JUDGE: RICHARD L.
BOURGEOIS, JR.**

ORDER

Upon consideration of the above and foregoing, the record of these proceedings, and the law;

IT IS ORDERED that Jill L. Craft, Trial Attorney, W. Brett Conrad, Jr., and the Law Offices of Jill L. Craft, Attorney at Law, LLC be and are hereby permitted to withdraw as counsel of record for the plaintiff, Carl Cavalier.

Baton Rouge, Louisiana, this _____ day of _____, 2022.

Honorable John W. deGravelles
United States District Judge