

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

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| <b>OSCAR DANTZLER</b>                         | * | <b>CIVIL ACTION NO.: 2:20-cv-02960</b>    |
|   | * |   |
| <b>Plaintiff</b>                              | * |   |
|   | * | <b>SECTION: "M"</b>                       |
| <b>Versus</b>                                 | * | <b>JUDGE: Barry W. Ashe</b>               |
|   | * |   |
| <b>TANGIPAHOA PARISH SCHOOL BOARD, et al.</b> | * |   |
|   | * | <b>MAGISTRATE: (2)</b>                    |
| <b>Defendants</b>                             | * | <b>Magistrate Donna Phillips Currault</b> |
|   | * |   |
| *****   |   |   |

**MEMORANDUM IN OPPOSITION TO  
PLAINTIFF’S PRO SE FILINGS PERTAINING TO  
TENDER OF CLIENT FILE VIA ELECTRONIC MAIL**

**MAY IT PLEASE THE COURT,**

Undersigned counsel submits this Memorandum in Opposition to the plaintiff’s pro se filings, R. Doc. No. 116, requesting undersigned counsel tender by electronic mail his entire client file pertaining to this matter.<sup>1</sup> His concerns regarding the United States Postal Service notwithstanding,<sup>2</sup> plaintiff’s demand that undersigned counsel tender the entire client file via

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<sup>1</sup> Undersigned counsel is mindful of his continuing duties to plaintiff under the Louisiana Rules of Professional Conduct, which arguably limit the contents of any statement made in this pleading. With those limitations in mind, undersigned counsel unequivocally denies the allegations made by plaintiff in these proceedings and unequivocally denies doing anything other than representing plaintiff’s interests in these proceedings to the very best of his abilities. Having said that, undersigned counsel nevertheless apologizes to this Court and its Officers for the circumstances that have given rise to the necessity of this pleading.

<sup>2</sup> Undersigned counsel advises that he has already sent a copy of plaintiff’s file to plaintiff at the address located at 1203 Apple Street., Hammond, Louisiana 70401, though undersigned counsel acknowledges that the file was placed on CD-ROM, and duplicate items were removed to facilitate copying. In light of the circumstances and out of an abundance of caution, undersigned counsel is unsatisfied with the previous tender of the plaintiff’s file, irrespective of plaintiff’s concerns regarding the United States Postal Service.

electronic mail is impractical and unworkable and would cause substantial undue burden upon undersigned counsel.

As an alternative, undersigned counsel respectfully proposes to submit to the Court a copy of undersigned counsel's entire client file (updated to include the filing of this pleading) pertaining to his representation of the plaintiff in the above captioned matter, which would be placed on a thumbdrive and could be available to plaintiff for pick-up with the Office of the Clerk (or otherwise as per the discretion of the Court).

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

**I DO HEREBY CERTIFY** that on July 29, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.



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**CLAIBORNE W. BROWN**