



JOHN BEL EDWARDS
GOVERNOR

Lamar A. Davis, COLONEL
DEPUTY SECRETARY

State of Louisiana
Department of Public Safety and Corrections
Public Safety Services

October 19, 2022

Mr. Jason Hannaman, Executive Director (via email and U.S. Mail)
Louisiana State Police Commission
P.O. Box 6655
Baton Rouge, LA 70896

RECEIVED
OCT 19 2022

State Police Commission

In Re: Appeal of Carl Cavalier
State Police Commission
Docket No. 21-256-D, 21-261-T, & 21-257-S

Dear Mr. Hannaman:

Enclosed for presentation to the Louisiana State Police Commission is the *Motion and Order to Continue Hearings and Objection to Appellant's Counsel Withdrawal* with an order for consideration.

Please feel free to contact me (225) 925-6103, or via email, if you have any questions.

Respectfully Submitted:

Louisiana Department of
Public Safety and Corrections,
Public Safety Services

Deputy General Counsel
Gail C. Holland

Enclosures: Motion and Order to Continue Hearings and Objection to Appellant's Counsel Withdrawal

Cc: M. Lenore Feeney Jill L. Craft, Bret Conrad Jr., Jason Hannaman (via email),

COURTESY • LOYALTY • SERVICE
"An Equal Opportunity Employer"
P.O. BOX 66614, BATON ROUGE, LOUISIANA 70896

STATE OF LOUISIANA

DOCKET NUMBER 21-261-T, 21-256-D,
& 21-257-S

CARL CAVALIER

STATE POLICE COMMISSION

PARISH OF EAST BATON ROUGE

CARL CAVALIER

STATE OF LOUISIANA

.....
**MOTION AND ORDER TO CONTINUE HEARINGS AND OBJECTION TO
APPELLANT'S COUNSEL WITHDRAWAL**

NOW INTO COURT, through undersigned counsel, the State of Louisiana, Department of Public Safety and Corrections, Public Safety Services, Office of State Police, requests this Honorable Commission to continue without date DOCKET NUMBER 21-257-S; 21-256-D; 21-261-T, and object to appellant's counsel withdrawal and /or substitution of counsel at this time.

1.

Docket Number 21-261-T is scheduled for a hearing on November 10, 2022 at 9:00 a.m. at Veterans Memorial Auditorium, Suite 1247, Department of Agriculture & Forestry Building, 5825 Florida Blvd., Baton Rouge, La. 70806

2.

Louisiana State Police (through the Office of Risk Management and the Attorney General's Office for the State of Louisiana) has approved a settlement agreement which has been agreed to by the appellant Carl Cavalier and his counsel of record Jill Craft.

3.

Under the terms of the parties' settlement agreement, the cases currently pending before the Commission are moot insofar as they were resolved through compromise reached on October 6, 2022 during a court ordered settlement conference conducted by

RECEIVED

OCT 19 2022

State Police Commission

U.S. Magistrate Judge Richard Bourgeois, Jr. (although the final compromise agreement has yet to be signed by all parties).

4.

The appellant's attorney is a material witness to the terms and substance of the parties' agreement and therefore, Louisiana State Police would object to any withdrawal and/ or substitution of counsel at this time, particularly pending the outcome of the hearing set to occur before Magistrate Bourgeois on October 27, 2022 related to same issue.

WHEREFORE, the Louisiana Department of Public Safety & Corrections, Public Safety Services, Office of State Police prays this motion be granted and continued the hearings without date, and denied the request for appellant's counsel withdraw and /or substitution of counsel at this time.

Respectfully Submitted:

**Louisiana Department of Public
Safety, Public Safety Services,
Office of State Police**



Deputy General Counsel,

Gail C. Holland,

La. Bar Roll No. 23783

Gail.holland@la.gov

Tunde M. Animashaun, 19287

Babatunde.Animashaun@la.gov

P. O. Box 66614, Drawer A-6

Baton Rouge, Louisiana 70896

Tel: (225) 925-6103

fax : (225) 925-4624

RECEIVED

OCT 19 2022

State Police Commission

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing
“Motion and Order to Continue and objection to any withdrawal and substitution of
counsel at this time has been delivered to all known counsels of record via email and by
U.S. Mail, properly addressed and postage prepaid, the 19th day of October , 2022.



Gail C. Holland

RECEIVED

OCT 19 2022

State Police Commission