UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA ALEXANDRIA DIVISION

CHRIS AUGUSTINE, ET AL

CIVIL ACTION NO. 1:06CV1662

VS.

JUDGE DRELL

AVOYELLES PARISH POLICE JURY

MAG. JUDGE KIRK

MOTION TO DISQUALIFY EXPERT

NOW INTO COURT, through undersigned counsel, comes defendants herein, ELZIE BRYANT, KIRBY ROY, III, MARK BORRELL, DALE LABORDE, HENRY HINES, ANTHONY DESSELLE, MCKINLEY KELLER, TYRONE DUFOUR and KEITH LACOMBE, in their official capacities as members of the Avoyelles Parish Police Jury & THE AVOYELLES PARISH POLICE JURY, who represents:

1.

In a telephone status conference on April 20, 2007, counsel for plaintiff identified Glenn Koepp as their expert.

2.

For the reasons set forth in the attached memorandum, movers desire that Glenn Koepp be disqualified as the expert for the plaintiffs.

WHEREFORE, ELZIE BRYANT, KIRBY ROY, III, MARK BORRELL, DALE LABORDE, HENRY HINES, ANTHONY DESSELLE, MCKINLEY KELLER, TYRONE DUFOUR and KEITH LACOMBE in their official capacities as members of the Avoyelles Parish Police Jury & THE AVOYELLES PARISH POLICE JURY pray that this Motion be filed and be deemed good and sufficient; that said motion be granted and the this Honorable

Court disqualify Glenn Koepp as the expert for the plaintiffs; and, for all other general and equitable relief for which they are entitled.

RESPECTFULLY SUBMITTED:

OFFICE OF THE DISTRICT ATTORNEY - 12TH JDC - PARISH OF AVOYELLES

BY:

CORY P. ROY (Bar Roll #27066)

Assistant District Attorney

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CERTIFICATE

I hereby certify that a copy of the above and foregoing Motion to Disqualify Expert has been provided to the following counsel of record by United States mail, postage prepaid and properly addressed.

Mr. Charles D. Jones
 Attorney at Law
 141 DeSiard Street
 Suite 315
 Monroe, Louisiana 71201

Marksville, Louisiana, this 31st day of May, 2007.

CORY P. ROY

CHARLES A. RIDDLE, III AVOYELLES PARISH DISTRICT ATTORNEY

12th JUDICIAL DISTRICT

Michael F. Kelly First Assistant District Attorney Norris J. Greenhouse Assistant District Attorney-Section A Chief Miché Moreau (Assistant District Attorney-Section B Chief)* Dan B. McKay, Jr. (Section A Assistant District Attorney) Anthony F. Salario (Section B Assistant District Attorney)

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Telephone: 318-253-6587 318-253-6560 Fax:

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May 31, 2007

James T. Lee (Civil Assistant District Attorney) Renee Y. Roy Assistant District Attorney-O.C.S. & Juvenile Melissa W. Moreau IV-D Chief Assistant District Attorney Cory P. Roy Assistant District Attorney, Civil Division

Andrea D. Aymond (IV-D Assistant District Attorney)

Office Administrator: W. Max Campbell Victims Assistance Coordinator: Michael E. Robertson Criminal Investigator: Troy Redmon Worthless Check Coordinator: Golda Scharpon-Sampson

Clerk of Court Western District of Louisiana 105 Federal Building 515 Murray Street Alexandria, Louisiana 71301

Re:

Civil Action No. 1:06CV1662

Chris Augustine, et al

Avoyelles Parish Police Jury

Dear Ladies:

Enclosed are the original and one copy of a Motion to Disqualify Expert and Memorandum in Support of Motion to Disqualify Expert to be filed on behalf of the defendants. Please (1) file the original and (2) return one time-stamped copy to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am providing Judge Drell and opposing counsel with a copy of this filing.

With best wishes, I remain

Yours very truly,

Con RRON

Corv P. Rov

CPR/hlc Enclosure

CC:

Honorable Dee Drell

United States District Court Western District of Louisiana

Post Office Box 1071

Alexandria, Louisiana 71309

Western District of Louisiana May 31, 2007 Page 2

> Mr. Charles D. Jones Attorney at Law 141 DeSiard Street Suite 315 Monroe, Louisiana 71201

Honorable Charles A. Riddle, III District Attorney Parish of Avoyelles -12th Judicial District Post Office Box 1200 Marksville, Louisiana 71351

Ms. Allison B. Laborde Secretary-Treasurer Avoyelles Parish Police Jury 312 North Main Street Courthouse Building Marksville, Louisiana 71351