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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

**REPLY MEMORANDUM TO PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION TO DISQUALIFY EXPERT**

**MAY IT PLEASE THE COURT**

In response to plaintiff's Memorandum in Opposition to defendant's Motion to Disqualify Expert, [Doc. 23] Avoyelles Parish Police Jury shows that Glenn Koepp was accepted as an expert in the case entitled "*Rev. Charles E. Guillory, et al v. Avoyelles Parish School Board*, Civil Action No. 1:03CV285." However, that has no relevance or bearing on the present case.

Plaintiffs allege that Glenn Koepp's position as Secretary of the Senate – State of Louisiana, has no bearing whatsoever on his ability to testify as an expert in this matter. That is incorrect. Avoyelles Parish Police Jury shows that a similar Motion was filed in the case entitled, "*Rev. Charles E. Guillory, et al v. Avoyelles Parish School Board*, Civil Action No. 1:03CV285." At the hearing on said Motion, which occurred on July 17, 2006, Glenn Koepp testified on numerous occasions that his office and/or position would be involved in the approval process of precinct changes regarding the Police Jury.

A certified copy of the transcript of that hearing is attached hereto as Exhibit "A".

Plaintiffs allege that counsel for Avoyelles Parish Police Jury has been aware of the fact that Glenn Koepp would be performing work for the plaintiffs as an expert. This also is incorrect. Attached is a sworn Affidavit executed by Charles A. Riddle, III, District Attorney, Parish of Avoyelles (Exhibit "B"). As the court will note, counsel for Avoyelles Parish Police Jury did not learn until March, 2007, that Glenn Koepp would be utilized as an expert on the plaintiff's behalf. Accordingly, this contention is without merit.

For the reasons contained in the original Memorandum submitted on behalf of Avoyelles Parish Police Jury and this Reply Memorandum, this Honorable Court shall exclude Glenn Koepp from testifying as an expert witness in this matter.

**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 Reply Memorandum 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 - 12<sup>TH</sup> JDC - PARISH OF AVOYELLES

BY:



CORY P. ROY (Bar Roll #27066)

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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

**CERTIFICATE**

I hereby certify that a copy of the above and foregoing Reply Memorandum to Plaintiff's Opposition to Defendant's 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 3<sup>rd</sup> day of July, 2007.

  
\_\_\_\_\_  
CORY P. ROY

**CHARLES A. RIDDLE, III**  
**AVOYELLES PARISH DISTRICT ATTORNEY**  
**12<sup>th</sup> JUDICIAL DISTRICT**

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First Assistant District Attorney  
**Norris J. Greenhouse**  
Assistant District Attorney-Section A Chief  
**Miché Moreau** (Assistant District Attorney-Section B Chief)\*  
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July 3, 2007

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  
v.  
Avoyelles Parish Police Jury

Dear Ladies:

Enclosed are the original and one copy of a Reply Memorandum to Plaintiff's Opposition to Defendant's Motion to Disqualify Expert. Please (1) file the original and (2) return one time-stamped copy to me in the enclosed self-addressed, stamped envelope. *Dene JPB*

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,

*Cory P. Roy*  
Cory P. Roy

CPR/hlc

Enclosures

Cc: Honorable Dee Drell  
United States District Court  
Western District of Louisiana  
Post Office Box 1071  
Alexandria, Louisiana 71309

Clerk of Court  
Western District of Louisiana  
July 3, 2007  
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