

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

DARCY ROAKE, et al.,

PLAINTIFFS,

v.

CADE BRUMLEY, et al.,

DEFENDANTS.

Civil Action No. 3:24-cv-517

Judge: JWD - SDJ

DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants Cade Brumley, Conrad Appel, Judy Armstrong, Kevin Berken, Preston Castille, Simone Champagne, Sharon Latten-Clark, Lance Harris, Paul Hollis, Sandy Holloway, Stacey Melerine, Ronnie Morris, East Baton Rouge Parish School Board, Livingston Parish School Board, Vernon Parish School Board, and St. Tammany Parish School Board move for dismissal of Plaintiffs claims (Counts I and II) in Plaintiffs' Complaint, ECF No. 1, for the reasons stated in their attached Memorandum of Law.

Dated: August 5, 2024

Respectfully submitted,

/s/ J. Benjamin Aguiñaga
J. BENJAMIN AGUIÑAGA*
Solicitor General

/s/ Zachary Faircloth
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Judy Armstrong, Kevin Berken, Preston Castille, Simone
Champagne, Sharon Latten-Clark, Lance Harris, Paul
Hollis, Sandy Holloway, Stacey Melerine, Ronnie Morris,
East Baton Rouge Parish School Board, Livingston Parish
School Board, Vernon Parish School Board, and St.
Tammany Parish School Board*

**pro hac vice granted*