

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

LOUISIANA STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE;  
ANTHONY ALLEN; and STEPHANIE  
ANTHONY,

Plaintiffs

v.

STATE OF LOUISIANA; and R. KYLE  
ARDOIN, in his official capacity as Secretary of  
State of Louisiana,

Defendants

Case No. 3:19-cv-00479-JWD-EWD

**MOTION FOR LEAVE TO SUBSTITUTE PLEADING**

NOW INTO COURT, through undersigned counsel, comes Defendant, the State of Louisiana, through Attorney General Liz Murrill, who respectfully requests this Court to grant leave to substitute the attached Motion to Withdraw Angelique Duhon Freel As Counsel previously filed on January 3, 2024 as document 185.

WHEREFORE, Defendant, the State of Louisiana, through Attorney General Liz Murrill, respectfully prays that the Court permit the attached Motion to Withdraw As Counsel to be filed in this matter.

Respectfully submitted,

LIZ MURRILL  
ATTORNEY GENERAL

BY: /s/ Carey T. Jones  
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Elizabeth B. Murrill (La. Bar #20685)  
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\*admitted pro hac vice

*Counsel for Defendant State of Louisiana*

**CERTIFICATE OF SERVICE**

**I CERTIFY** I have served the foregoing was filed electronically and served on counsel for the parties by electronic notification by CM/ECF on January 19, 2024.

/s/ Carey T. Jones  
Carey T. Jones

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

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**MOTION TO WITHDRAW ANGELIQUE DUHON FREEL AS COUNSEL**

NOW INTO COURT, through undersigned counsel, comes Defendant, the State of Louisiana, through Attorney General Liz Murrill, who respectfully submits this motion to withdraw Angelique Freel as counsel of record in this matter.

Angelique Freel ended her service with the Department of Justice, Office of the Attorney General, effective January 8, 2024 and thereby no longer has authority to serve as legal counsel for the State of Louisiana and wishes to withdraw as counsel. The State of Louisiana will remain represented by the other counsel enrolled in this suit.

WHEREFORE, Defendant, the State of Louisiana, through Louisiana Attorney General Liz Murrill, respectfully prays that this motion be granted and Angelique Freel be withdrawn as counsel of record in this matter.

Respectfully submitted,

JEFF LANDRY  
ATTORNEY GENERAL

BY: /s/ Angelique Duhon Freel  
Elizabeth B. Murrill (La. Bar #20685)  
*Attorney General* – Lead Counsel  
Carey T. Jones (La. Bar #07474)  
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\*admitted pro hac vice

*Counsel for Defendant State of Louisiana*

**CERTIFICATE OF SERVICE**

**I CERTIFY** I have served the foregoing was filed electronically and served on counsel for the parties by electronic notification by CM/ECF on January 19, 2024.

/s/ Carey T. Jones  
CAREY T. JONES

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**ORDER**

Considering the foregoing Motion for Leave to Substitute Pleading,

IT IS ORDERED, that the Motion for Leave to Substitute Pleading filed by Defendant, State of Louisiana, Through Attorney General Liz Murrill, is GRANTED, thereby substituting the attached Motion to Withdraw As Counsel, and allowing the withdrawal of Angelique Freel as counsel for Defendant, State of Louisiana, Through Attorney General Liz Murrill, in this matter.

Baton Rouge, Louisiana, on this \_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
JUDGE JOHN W. DEGRAVELLES  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

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**[PROPOSED] ORDER ALLOWING ANGELIQUE DUHON FREEL TO WITHDRAW  
AS COUNSEL**

CONSIDERING the foregoing Motion to Withdraw Counsel,

IT IS ORDERED that the Attorney General's motion is GRANTED and Angelique Duhon Freel is withdrawn as counsel of record for Defendant, the State of Louisiana, Through Liz Murrill, in her official capacity as Attorney General of Louisiana. The Clerk is directed to terminate Ms. Freel's appearances on the court's docket.

READ SIGNED AND DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024, in  
Baton Rouge, Louisiana.

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JUDGE JOHN W. DEGRAVELLES  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA