

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

**DR. DOROTHY NAIRNE, ET AL.**

**CIVIL ACTION**

**VERSUS**

**NO. 3:22-CV-00178**

**R. KYLE ARDOIN, in his official capacity  
As Secretary of State of Louisiana**

**MOTION FOR LEAVE TO SUBSTITUTE PLEADING**

NOW INTO COURT, through undersigned counsel, comes Defendant, NANCY LANDRY, in her official capacity as Secretary of State of Louisiana, who respectfully requests this Court to grant leave to substitute the attached Motion to Withdraw Counsel of Record for the document previously filed on January 10, 2024 as Document 220..

WHEREFORE, Defendant, Nancy Landry, respectfully prays that Court permit the attached Motion to Withdraw Counsel of Record to be filed in this matter.

Respectfully Submitted:

/s/John C. Walsh  
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*\*Admitted pro hac vice*

*Counsel for Nancy Landry, in her official capacity  
As Secretary of State of Louisiana*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 11th day of January, 2024, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, and notice will be sent to all counsel by operation of the court's electronic filing system.

*s/ John C. Walsh*  
JOHN C. WALSH

UNITED STATES DISTRICT COURT  
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**MOTION TO WITHDRAW COUNSEL OF RECORD**

NOW INTO COURT, through undersigned counsel, comes Defendant, NANCY LANDRY, in her official capacity as Secretary of State of Louisiana, who respectfully requests that CHARLTON J. MEGINLEY (La. Bar Roll No. 28150) be allowed to withdraw as counsel of record for Defendant in this matter.

Charlton J. Meginley represented the Defendant, and was employed as General Counsel for R. Kyle Ardoin. He has left his employment with the Secretary of State. The Defendant will remain represented by the other counsel in this suit. Pursuant to Local Rule 83(b)(13), the undersigned certifies that Charlton J. Meginley has consented to his withdrawal from these proceedings.

WHEREFORE, Defendant, NANCY LANDRY, respectfully prays that Charlton J. Meginley be withdrawn as counsel of record for Defendant in this matter.

Respectfully Submitted:

/s/John C. Walsh  
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*\*Admitted pro hac vice*

*Counsel for Nancy Landry, in her official capacity  
As Secretary of State of Louisiana*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 11th day of January, 2024, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, and notice will be sent to all counsel by operation of the court's electronic filing system.

*s/ John C. Walsh*  
JOHN C. WALSH

UNITED STATES DISTRICT COURT  
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**ORDER**

Considering the foregoing *Motion to Withdraw Counsel of Record*,

**IT IS ORDERED**, that Charlton J. Meginley is hereby withdrawn as additional counsel of record for Defendant in this matter.

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

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JUDGE  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

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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, Nancy Landry, is GRANTED, thereby substituting the attached Motion to Withdraw Counsel of Record, and allowing the withdrawal of Charlton J. Meginley as counsel of record for Defendant in this matter.

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

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JUDGE  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA