

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF LOUISIANA**

RANDY J. BOUDREAUX
Plaintiff,

v.

LOUISIANA STATE BAR ASSOCIATION, a
Louisiana Nonprofit Corporation;
LOUISIANA SUPREME COURT;
BERNETTE J. JOHNSON, Chief Justice of the
Louisiana Supreme Court;
JOHN DOE, successor to the Honorable Greg
Guidry as Associate Justice of the Louisiana
Supreme Court for the First District;
SCOTT J. CRICHTON, Associate Justice of the
Louisiana Supreme Court for the Second District;
JAMES T. GENOVESE, Associate Justice of the
Louisiana Supreme Court for the Third District;
MARCUS R. CLARK, Associate Justice of the
Louisiana Supreme Court for the Fourth District;
JEFFERSON D. HUGHES, III, Associate Justice
of the Louisiana Supreme Court for the
Fifth District;
JOHN L. WEIMER, Associate Justice of the
Louisiana Supreme Court for the Sixth District,
Defendants.

CIVIL ACTION

Case No. 19-cv-11962

SECTION "I" (1)

Judge Lance M. Africk

Mag. Judge van Meerveld

**DEFENDANTS' MOTION TO DISMISS
PURSUANT TO RULE 12(b)(1)**

The Plaintiff has filed a federal court lawsuit seeking an advisory opinion on the constitutionality of the Louisiana State Bar Association. As set forth in the supporting memorandum filed concurrently herewith, the Court lacks subject matter jurisdiction over the Complaint. The Louisiana State Bar Association, Louisiana Supreme Court, Chief Justice Johnson, Justice Crichton, Justice Genovese, Justice Clark, Justice Hughes, and Justice Weimer,

through undersigned counsel, respectfully request that the Court dismiss the Complaint pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Eva J. Dossier

Richard C. Stanley, 8487

Eva J. Dossier, 35753

Kathryn W. Munson, 35933

STANLEY, REUTER, ROSS,

THORNTON & ALFORD, L.L.C.

909 Poydras Street, Suite 2500

New Orleans, Louisiana 70112

Telephone: (504) 523-1580

Facsimile: (504) 524-0069

Counsel for the Louisiana State Bar Association, Louisiana Supreme Court, Chief Justice Johnson, Justice Crichton, Justice Genovese, Justice Clark, Justice Hughes, and Justice Weimer

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF LOUISIANA**

RANDY J. BOUDREAUX
Plaintiff,

v.

LOUISIANA STATE BAR ASSOCIATION, a
Louisiana Nonprofit Corporation;
LOUISIANA SUPREME COURT;
BERNETTE J. JOHNSON, Chief Justice of the
Louisiana Supreme Court;
JOHN DOE, successor to the Honorable Greg
Guidry as Associate Justice of the Louisiana
Supreme Court for the First District;
SCOTT J. CRICHTON, Associate Justice of the
Louisiana Supreme Court for the Second District;
JAMES T. GENOVESE, Associate Justice of the
Louisiana Supreme Court for the Third District;
MARCUS R. CLARK, Associate Justice of the
Louisiana Supreme Court for the Fourth District;
JEFFERSON D. HUGHES, III, Associate Justice
of the Louisiana Supreme Court for the
Fifth District;
JOHN L. WEIMER, Associate Justice of the
Louisiana Supreme Court for the Sixth District,
Defendants.

CIVIL ACTION

Case No. 19-cv-11962

SECTION "I" (1)

Judge Lance M. Africk

Mag. Judge van Meerveld

NOTICE OF SUBMISSION

PLEASE TAKE NOTICE that the Louisiana State Bar Association, Louisiana Supreme Court, Chief Justice Johnson, Justice Crichton, Justice Genovese, Justice Clark, Justice Hughes, and Justice Weimer (collectively, "Defendants"), through undersigned counsel, have filed a Motion to Dismiss Pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure. The Defendants will submit this motion on the October 23, 2019 submission date, or as soon thereafter

as the Court's docket permits, before the Honorable Lance M. Africk, United States District Court for the Eastern District of Louisiana, 500 Poydras Street, New Orleans, Louisiana 70130.

Respectfully submitted,

/s/ Eva J. Dossier

Richard C. Stanley, 8487

Eva J. Dossier, 35753

Kathryn W. Munson, 35933

STANLEY, REUTER, ROSS,

THORNTON & ALFORD, L.L.C.

909 Poydras Street, Suite 2500

New Orleans, Louisiana 70112

Telephone: (504) 523-1580

Facsimile: (504) 524-0069

Counsel for the Louisiana State Bar Association, Louisiana Supreme Court, Chief Justice Johnson, Justice Crichton, Justice Genovese, Justice Clark, Justice Hughes, and Justice Weimer