

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT LOUISIANA**

ERNEST TAYLOR

VERSUS

THE CITY OF BATON ROUGE, ET AL

CIVIL ACTION

NO. 3:13-CV-579-BAJ-RLB

MOTION FOR LEAVE TO FILE EXHIBIT CONVENTIONALLY

NOW INTO COURT through undersigned counsel come defendants, City of Baton Rouge, Chief of Police Carl Dabadie, Jr., East Baton Rouge Parish Attorney, Mary Roper, Baton Rouge City Prosecutor, Lisa Freeman, Baton Rouge Police Officer Patrick Wennemann, Baton Rouge Police Officer James Thomas, and female Baton Rouge Police Officer, referred to as Jane Doe, through undersigned counsel, move this Court pursuant for leave to file the incident video of Plaintiff, Ernest Taylor, and dispatch call log from April 29, 2014, conventionally for those reasons stated below.

1.

On June 27, 2014, Plaintiff filed a Notice of Facts Related to Current Proceeding.

2.

On July 1, 2014, this Honorable Court issued an Order to the Counsel for the Defendants to submit a Memorandum in Response no later than July 3, 2014 at 5:00 p.m.

3.

That although this criminal matter is currently under investigation by the Baton Rouge City Police Department, the Court Ordered that Counsel for the Defendants attach a copy of the incident report to the Memorandum in Response.

4.

That in an effort to comply with the Court's Order, Counsel for the Defendants acquired the dispatch call log and in-car camera video of this incident.

5.

The Court's CM/ECF system only permits filing of files in Portable Document Format ("PDF"). See MDLA Administrative Procedures for Filing Electronic Documents, §I(A)(1).

6.

The video showing Plaintiff's arrest cannot be converted to PDF format, and therefore cannot be submitted electronically through the Court's CM/ECF system.

7.

Defendants seek to submit the certified video of Taylor's incident and the dispatch

call log conventionally through the submission of a DVD-ROM and CD.

BY ATTORNEYS:

Mary E. Roper
Parish Attorney

/s/ Tedrick K. Knightshead

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ORDER

Considering the foregoing Motion for Leave to File Exhibit Conventionally;

IT IS THEREFORE ORDERED, that Defendant is granted leave to file a true and correct copy of the certified video and dispatch log of Earnest Taylor's incident on April 29, 2014.

Baton Rouge, Louisiana, this _____ day of _____, 2014.

HON. BRIAN A. JACKSON
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE

I hereby certify that a copy of the foregoing Motion for Leave was this date electronically filed with the Clerk of Court using the Court's CM/ECF system. Notice of this filing will be sent to Mr. Terrance Donahue, Jr. by operation of the Court's electronic filing system.

/s/ Tedrick K. Knightshead

Tedrick K. Knightshead