

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

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ANNE WHITE HAT, RAMON MEJÍA, KAREN SAVAGE, SHARON LAVIGNE, HARRY JOSEPH, KATHERINE AASLESTAD, PETER AASLESTAD, THEDA LARSON WRIGHT, ALBERTA LARSON STEVENS, JUDITH LARSON HERNANDEZ, RISE ST. JAMES, 350 NEW ORLEANS, and LOUISIANA BUCKET BRIGADE

Civil Action No. 19-cv-322-JWD-EWD

Plaintiffs,

JUDGE John W. deGravelles

v.

MAGISTRATE JUDGE Erin Wilder-Doomes

JEFF LANDRY, in his official capacity as Attorney General of Louisiana; BO DUHÉ, in his official capacity as District Attorney of the 16th Judicial District Attorney’s Office; RONALD J. THERIOT, in his official capacity as Sheriff of St. Martin Parish,,

Defendant.

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PLAINTIFFS’ MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT

NOW INTO COURT, through undersigned counsel, come Plaintiffs, who respectfully submit this Motion for Leave to File Supplemental Complaint pursuant to Federal Rule of Civil Procedure 15(d). The proposed Supplemental Complaint includes new allegations concerning the standing of Plaintiffs Sharon Lavigne and RISE St. James and impact of the 2018 amendments to La. R.S. 14:61 on them. The new factual allegations and supplemental claim relate to recent events that have occurred since the filing of the complaint and briefing of Defendants’ motions to dismiss and further demonstrate the law’s unconstitutional vagueness and overbreadth, and its interference with the practice of religion in violation of the First Amendment.

Plaintiffs have requested consent from all Defendants' counsel of record regarding this motion and all oppose.

WHEREFORE, Plaintiffs respectfully pray that this Court grant it leave to file a Supplemental Complaint.

Date: July 6, 2020

Respectfully submitted,

s/Astha Sharma Pokharel
ASTHA SHARMA POKHAREL
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2020, a copy of the foregoing was filed with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record unless indicated otherwise.

s/Astha Sharma Pokharel
Astha Sharma Pokharel