

LAW OFFICES  
**RONALD F. LATTIER**

Ronald F. Lattier  
rfl\_esq@bellsouth.net

Curtis R. Joseph, Jr.  
misterjoseph@bellsouth.net

Senae D. Hall  
senaedhall@gmail.com

Beaird Tower  
330 Marshall Street, Suite 1411  
Post Office Box 177  
Shreveport, Louisiana 71161-0177  
Telephone: (318) 213-1077  
Facsimile: (318) 213-1079

Legal Assistants  
Andrea J. Lattier  
Elise L. Lattier  
Velda N. Metcalf

June 17, 2013

Honorable Gary Loftin  
Clerk of Court  
First Judicial District Court  
501 Texas Street  
Shreveport, LA 71101

RE: Cynthia Keith, individually, as Director of and on behalf of Shreveport Dog Park Alliance, an unincorporated association v. Cedric B. Glover, individually, and as duly elected Mayor of the City of Shreveport  
Suit No: 567,251-C, 1<sup>st</sup> JDC, Caddo Parish, LA  
Our File No: 340.0072

Dear Mr. Loftin:

Enclosed please find: (1) Motion and Order to Stay Proceedings and Memorandum in Support thereof; (2) Notice of Intent to Apply for Supervisory Writ along with the Motion and Order for Setting of Return Date; and (3) Motion and Order for Suspensive Appeal, to be filed into the record on behalf of the defendant, CEDRIC B. GLOVER, AS THE DULY ELECTED MAYOR OF THE CITY OF SHREVEPORT, as it regards the above referenced matter.

Please present the enclosed to the Court for consideration, and after all hearings have been set, have the plaintiff served as follows:

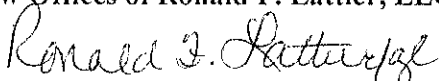
**CYNTHIA KEITH, individually, as director of, and on behalf of SHREVEPORT DOG PARK ALLIANCE, an unincorporated association**  
Through her attorney of record  
Daniel R. Keele  
2800 Youree Drive, Suite 464  
Shreveport, LA 71104

Please also provide counsel of record with a signed Order of all settings. By copy of this correspondence, we have provided the interested parties with a courtesy copy of the enclosures.

Also enclosed is an extra copy of each pleading to be stamped filed and returned to me for my file.

As always, your professional courtesies are appreciated.

Very truly yours,  
Law Offices of Ronald F. Lattier, LLC

  
Ronald F. Lattier

RFL/ajt

Enclosures

cc: Honorable Leon L. Emanuel, III (via hand delivery)  
Mr. Daniel R. Keele [via email (k9lawyer@bellsouth.net), facsimile (861-4520) and US Mail]

FILED  
JUN 17 2013  
JIM SCOTT  
CADDO DEPUTY CLERK OF COURT

CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED  
MAYOR OF THE CITY OF SHREVEPORT CADDO PARISH, LOUISIANA

**MOTION FOR SUSPENSIVE APPEAL**

NOW INTO COURT, through undersigned counsel, comes defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, who requests that this Honorable Court grant a suspensive appeal from its Judgment signed on June 7, 2013.

WHEREFORE, defendant respectfully prays that a suspensive appeal be granted.

Respectfully submitted,  
LAW OFFICES OF RONALD F. LATTIER, LLC

By: 

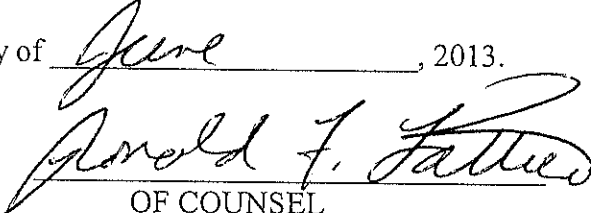
Ronald F. Lattier, La. Bar Roll No. 19674  
Curtis R. Joseph, Jr., La. Bar Roll No. 26944  
Senae D. Hall, La. Bar Roll No. 33875  
330 Marshall Street, Suite 1411  
Post Office Box 177  
Shreveport, LA 71161-0177  
Telephone: (318) 213-1077  
Facsimile: (318) 213-1079  
ATTORNEYS FOR DEFENDANT,  
CEDRIC B. GLOVER, as duly elected Mayor  
of the CITY OF SHREVEPORT

**CERTIFICATE**

I HEREBY CERTIFY that the above and foregoing has been forwarded to all counsel of record via United States Mail, properly addressed to:

Daniel R. Keele  
Post Office Box 303  
Shreveport, LA 71162-0303

Shreveport, Louisiana, this 17<sup>th</sup> day of June, 2013.

  
OF COUNSEL

CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED  
MAYOR OF THE CITY OF SHREVEPORT

CADDO PARISH, LOUISIANA

**ORDER**

CONSIDERING THE FOREGOING:

IT IS HEREBY ORDERED that the Motion for Suspensive Appeal filed on behalf of defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, is hereby granted.

IT IS FURTHER ORDERED that the suspensive appeal be returnable to the Court of Appeal, Second Circuit, on the \_\_\_\_\_ day of \_\_\_\_\_, 2013.

THUS DONE AND SIGNED at Shreveport, Caddo Parish, Louisiana, this the \_\_\_\_\_ day of \_\_\_\_\_, 2013.

\_\_\_\_\_  
JUDGE

PLEASE SERVE:

**CYNTHIA KEITH, individually, as director of, and on behalf of SHREVEPORT DOG PARK ALLIANCE, an unincorporated association**

Through her attorney of record

Daniel R. Keele

2800 Youree Drive, Suite 464

Shreveport, LA 71104

CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED  
MAYOR OF THE CITY OF SHREVEPORT

CADDO PARISH, LOUISIANA

NOTICE OF INTENT TO FILE WRIT APPLICATION

FILED

TO: HONORABLE LEON L. EMANUEL, III  
Judge - First Judicial District Court  
501 Texas Street  
Shreveport, LA 71101

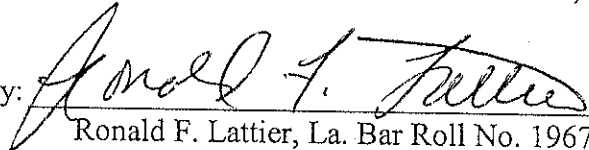
JUN 17 2013

JIM SCOTT  
CADDO DEPUTY CLERK OF COURT

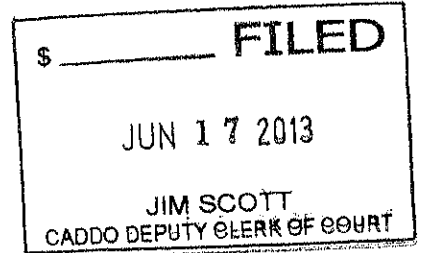
CYNTHIA KEITH, individually, as director of, and on behalf of SHREVEPORT DOG  
PARK ALLIANCE, an unincorporated association  
Through her attorney of record  
Daniel R. Keele  
2800 Youree Drive, Suite 464  
Shreveport, LA 71104

In accordance with Rule 4-2 of the Uniform Rules of the Courts of Appeal, you are hereby notified that defendant, CEDRIC B. GLOVER, in his official capacity as duly elected Mayor of the CITY OF SHREVEPORT, intends to apply to apply to the Second Circuit Court of Appeal, State of Louisiana, for a supervisory writ of certiorari, seeking supervisory jurisdiction of the Second Circuit Court of Appeal from the ruling made by Judge Leon L. Emanuel, III on May 7, 2013. At the time of the instant filing, the trial court has not yet executed the written judgment commemorating his ruling of May 7, 2013.

Respectfully submitted,  
LAW OFFICES OF RONALD F. LATTIER, LLC

By: 

Ronald F. Lattier, La. Bar Roll No. 19674  
Curtis R. Joseph, Jr., La. Bar Roll No. 26944  
Senae D. Hall, La. Bar Roll No. 33875  
330 Marshall Street, Suite 1411  
Post Office Box 177  
Shreveport, LA 71161-0177  
Telephone: (318) 213-1077  
Facsimile: (318) 213-1079  
ATTORNEYS FOR DEFENDANT,  
CEDRIC B. GLOVER, as duly elected Mayor  
of the CITY OF SHREVEPORT



CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED

MAYOR OF THE CITY OF SHREVEPORT CADDO PARISH, LOUISIANA

MOTION FOR SETTING OF RETURN DATE

NOW INTO COURT, through undersigned counsel, comes defendant, CEDRIC B. GLOVER, in his official capacity as duly elected Mayor of the CITY OF SHREVEPORT, who respectfully requests that a return date be set in connection with its writ application to the Second Circuit regarding the ruling of Judge Leon L. Emanuel, III, made on May 7, 2013. Mover respectfully requests the full thirty (30) day period from notice of the court's signing of the judgment attendant with his ruling of May 7, 2013.

Respectfully submitted,  
LAW OFFICES OF RONALD F. LATTIER, LLC

By: *Ronald F. Lattier*  
Ronald F. Lattier, La. Bar Roll No. 19674  
Curtis R. Joseph, Jr., La. Bar Roll No. 26944  
Senae D. Hall, La. Bar Roll No. 33875  
330 Marshall Street, Suite 1411  
Post Office Box 177  
Shreveport, LA 71161-0177  
Telephone: (318) 213-1077  
Facsimile: (318) 213-1079  
ATTORNEYS FOR DEFENDANT,  
CEDRIC B. GLOVER, as duly elected Mayor  
of the CITY OF SHREVEPORT

CERTIFICATE

I HEREBY CERTIFY that the above and foregoing has been forwarded to all counsel of record via United States Mail, properly addressed to:

Daniel R. Keele  
Post Office Box 303  
Shreveport, LA 71162-0303

Shreveport, Louisiana, this 17<sup>th</sup> day of June, 2013.

*Ronald F. Lattier*  
OF COUNSEL

CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED

MAYOR OF THE CITY OF SHREVEPORT CADDO PARISH, LOUISIANA

**ORDER**

Considering the foregoing Motion for Setting the Return Date in connection with the filing of an application for supervisory writ by defendant, CEDRIC B. GLOVER, in his official capacity as duly elected Mayor of the CITY OF SHREVEPORT:

IT IS HEREBY ORDERED that defendant, CEDRIC B. GLOVER, in his official capacity as duly elected Mayor of the CITY OF SHREVEPORT, is granted thirty (30) days from the date of notice of the signing of the judgment attendant with the trial court's ruling of May 16, 2013. Accordingly, Mover, CEDRIC B. GLOVER, in his official capacity as duly elected Mayor of the CITY OF SHREVEPORT, is to file its writ application by \_\_\_\_\_.

THIS \_\_\_\_\_ day of \_\_\_\_\_, 2013, Shreveport, Caddo Parish, Louisiana.

\_\_\_\_\_  
DISTRICT JUDGE

PLEASE SERVE:

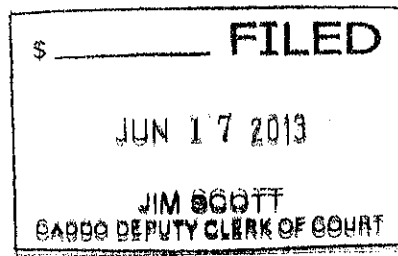
**CYNTHIA KEITH, individually, as director of, and on behalf of SHREVEPORT DOG PARK ALLIANCE, an unincorporated association**

Through her attorney of record

Daniel R. Keele

2800 Youree Drive, Suite 464

Shreveport, LA 71104



CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED

MAYOR OF THE CITY OF SHREVEPORT CADDO PARISH, LOUISIANA

MOTION TO STAY PROCEEDINGS

NOW INTO COURT, through undersigned counsel, comes defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, who moves this Court for an Order staying the proceedings in the above entitled and numbered cause until disposition is rendered by the appellate court. Defendant respectfully represents as follows:

1.

On or about May 7, 2013, Judge Leon L. Emanuel, III issued an oral ruling from the bench wherein he denied the exception of no cause of action filed on behalf of defendant herein, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT.

2.

Defendant/mover herein, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, intends to timely file a writ application requesting a de novo review of the record by the Second Circuit Court of Appeal. Moreover, defendant/mover herein seeks a reversal of the trial court's ruling which denied the exception of no cause of action filed on behalf of defendant herein, CEDRIC B. GLOVER, duly elected Mayor of the CITY OF SHREVEPORT.

3.

Additionally, on May 16, 2013, this Honorable Court rendered its oral ruling whereby it granted the writ of mandamus filed on behalf of plaintiff herein, CYNTHIA KEITH, individually, as director of, and on behalf of SHREVEPORT DOG PARK ALLIANCE, an unincorporated association.

4.

Inasmuch as defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, desires to appeal the court's ruling vis-a-vis the writ of mandamus, defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, moves this Court to stay the instant proceedings pending the disposition of these matters by the Second Circuit Court of Appeal.

WHEREFORE, mover herein, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, prays this court grant the subject motion, staying further proceedings in the above entitled and numbered cause, including this Honorable Court's June 21, 2013 deadline as well as this Court's June 26, 2013 rule to show cause until disposition is rendered by the Second Circuit Court of Appeal on the pending writ application and appeal sought by defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT.

Respectfully submitted,  
**LAW OFFICES OF RONALD F. LATTIER, LLC**

By: 

Ronald F. Lattier, La. Bar Roll No. 19674  
Curtis R. Joseph, Jr., La. Bar Roll No. 26944  
Senae D. Hall, La. Bar Roll No. 33875  
330 Marshall Street, Suite 1411  
Post Office Box 177  
Shreveport, LA 71161-0177  
Telephone: (318) 213-1077  
Facsimile: (318) 213-1079  
ATTORNEYS FOR DEFENDANT,  
CEDRIC B. GLOVER, as duly elected Mayor  
of the CITY OF SHREVEPORT



CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED

MAYOR OF THE CITY OF SHREVEPORT CADDO PARISH, LOUISIANA

MEMORANDUM IN SUPPORT OF MOTION TO STAY PROCEEDINGS

MAY IT PLEASE THE COURT:

On or about May 7, 2013, Judge Leon L. Emanuel, III issued an oral ruling from the bench wherein he denied the exception of no cause of action filed on behalf of defendant herein, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT.

Defendant/mover herein, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, intends to timely file a writ application requesting a de novo review of the record by the Second Circuit Court of Appeal. Moreover, defendant/mover herein seeks a reversal of the trial court's ruling which denied the exception of no cause of action filed on behalf of defendant herein, CEDRIC B. GLOVER, duly elected Mayor of the CITY OF SHREVEPORT.

Additionally, on May 16, 2013, this Honorable Court rendered its oral ruling whereby it granted the writ of mandamus filed on behalf of plaintiff herein, CYNTHIA KEITH, individually, as director of, and on behalf of SHREVEPORT DOG PARK ALLIANCE, an unincorporated association.

Inasmuch as defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, desires to appeal the court's ruling vis-a-vis the writ of mandamus, defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, moves this Court to stay the instant proceedings pending the disposition of these matters by the Second Circuit Court of Appeal.

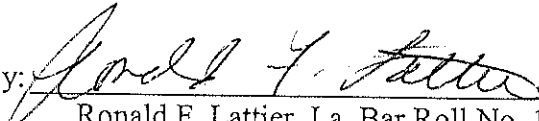
LAW AND ARGUMENT

Pursuant to Rule 4-4(A) of the Uniform Rules of the Courts of Appeal for the State of Louisiana, notwithstanding the pending writ application, the trial court has discretion in this arena. Moreover, motions to stay are properly initiated in the trial court.

Mover herein, defendant, CEDRIC B. GLOVER, as duly elected Mayor of the CITY OF SHREVEPORT, does not seek to unnecessarily retard the subject proceedings; rather, defendant moves for an order to temporarily stay the proceedings in this Court until disposition is rendered by the Second Circuit Court of Appeal on its pending writ application as it regards the denied exception of no cause of action and, further, defendant also seeks appellate review of this Court's grant of the petition for writ of mandamus filed by petitioner herein.

WHEREFORE, mover, CEDRIC B. GLOVER, duly elected Mayor of the CITY OF SHREVEPORT, defendant herein, respectfully prays that this Honorable Court exercise its vast discretion and grant this motion staying the instant proceedings as prayed for hereinabove.

Respectfully submitted,  
**LAW OFFICES OF RONALD F. LATTIER, LLC**

By: 

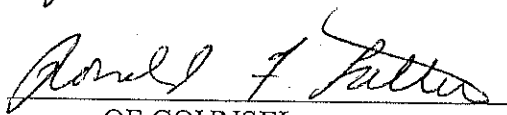
Ronald F. Lattier, La. Bar Roll No. 19674  
Curtis R. Joseph, Jr., La. Bar Roll No. 26944  
Senae D. Hall, La. Bar Roll No. 33875  
330 Marshall Street, Suite 1411  
Post Office Box 177  
Shreveport, LA 71161-0177  
Telephone: (318) 213-1077  
Facsimile: (318) 213-1079  
ATTORNEYS FOR DEFENDANT,  
CEDRIC B. GLOVER, as duly elected Mayor  
of the CITY OF SHREVEPORT

**CERTIFICATE**

I HEREBY CERTIFY that the above and foregoing has been forwarded to all counsel of record via United States Mail, properly addressed to:

Daniel R. Keele  
Post Office Box 303  
Shreveport, LA 71162-0303

Shreveport, Louisiana, this 17<sup>th</sup> day of June, 2013.

  
OF COUNSEL

CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF AND ON BEHALF  
OF SHREVEPORT DOG PARK ALLIANCE,  
AN UNINCORPORATED ASSOCIATION

SUIT NO: 567,251-C

VERSUS

FIRST JUDICIAL DISTRICT COURT

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED  
MAYOR OF THE CITY OF SHREVEPORT

CADDO PARISH, LOUISIANA

ORDER

CONSIDERING THE FOREGOING:

IT IS HEREBY ORDERED that the Motion to Stay Proceedings filed on behalf of defendant, CEDRIC B. GLOVER, AS DULY ELECTED MAYOR OF THE CITY OF SHREVEPORT, is hereby granted.

THUS DONE AND SIGNED at Shreveport, Caddo Parish, Louisiana, this \_\_\_\_ day of \_\_\_\_\_, 2013, in Shreveport, Caddo Parish, Louisiana.

\_\_\_\_\_  
JUDGE

PLEASE SERVE:

CYNTHIA KEITH, individually, as director of, and on behalf of SHREVEPORT DOG PARK ALLIANCE, an unincorporated association  
Through her attorney of record  
Daniel R. Keele  
2800 Youree Drive, Suite 464  
Shreveport, LA 71104