

**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*