

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

**BRETT PERCLE**

**CIVIL ACTION**

**VERSUS**

**NO. 3:14-CV-00449-SDD-RLB**

**THE CITY OF BATON ROUGE, CARL  
DABADIE, JR., INDIVIDUALLY AND IN  
HIS OFFICIAL CAPACITY AS CHIEF OF  
THE BATON ROUGE POLICE DEPARTMENT,  
DETECTIVE JASON ACREE, OFFICER JOHN DOE  
NO. 1, OFFICERS JOHN DOE NOS. 2-20 AND  
OFFICER ORSCINI BEARD**

\*\*\*\*\*

**JOINT NOTICE OF SETTLEMENT**

On joint motion of plaintiff, Brett Percle, and defendants, Detective Jason Acree, Officer Robert Moruzzi and The City of Baton Rouge, appearing herein through undersigned counsel, voluntarily move for an order of conditional dismissal of the plaintiff's claims alleged against all defendants and these entire proceedings with full prejudice as to the rights of all parties therein for the following reasons:

1.

The parties have amicably resolved and settled the attorney's fees and costs in the sum of FORTY-SEVEN THOUSAND FIVE HUNDRED 00/100 DOLLARS (\$47,500.00) for attorney fees and THREE THOUSAND NINE HUNDRED TWELVE 43/100 DOLLARS (\$3,912.43) for court costs for a total amount of \$51,412.43.

2.

A formal dismissal will be entered once final settlement documents are finalized.

**WHEREFORE**, Plaintiffs and Defendants JOINTLY pray for a sixty day conditional order of dismissal.

RESPECTFULLY SUBMITTED \_\_\_\_\_

/s/ Kearney S. Loughlin

KEARNEY S. LOUGHLIN

La. State Bar No. 26391

6030 Prytania Street

New Orleans, Louisiana 70118

Telephone: (504) 891-3193

Facsimile: (504) 891-3195

Email: [kloughlin@att.net](mailto:kloughlin@att.net)

*Attorney for Plaintiff, Brett Percle*

/s/ Tedrick K. Knightshead

TEDRICK K. KNIGHTSHEAD (#28851)

First Assistant Parish Attorney

222 St. Louis Street, 9<sup>th</sup> Floor (70802)

P.O. Box 1471

Baton Rouge, LA 70821

Telephone: 225-389-3114, Ext. 744

Facsimile: 225- 389-8736

Email: [tknightshead@brgov.com](mailto:tknightshead@brgov.com)

*Counsel for defendants*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Notice of Settlement 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 all counsel of record by operation of the Court's electronic filing system.

Baton Rouge, Louisiana this 23<sup>rd</sup> day of June, 2016.

/s/Tedrick K. Knightshead  
TEDRICK K. KNIGHTSHEAD