

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

COMMON CAUSE INDIANA, )  
ANDERSON-MADISON COUNTY )  
NAACP BRANCH 3058, LEAGUE )  
OF WOMEN VOTERS OF INDIANA, )  
CASSANDRA RIGGS, and )  
JEFFREY J. COTTRELL, )

Plaintiffs, )

v. )

CITY OF ANDERSON COMMON )  
COUNCIL, and the MADISON )  
COUNTY BOARD OF ELECTIONS, )

Defendants. )

) CAUSE NO. 1:23-cv-1022-JRS-TAB

**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT CITY OF  
ANDERSON COMMON COUNCIL**

Attorney Steven M. Laduzinsky hereby moves to withdraw as counsel of record for Defendant City of Anderson Common Council, stating the following in support thereof:

1. Attorneys Rosemay Khoury, Steven M. Laduzinsky and Devlin Joseph Schoop filed appearances in this matter to represent the interests of the Defendant City of Anderson Common Council (“the Anderson Common Council”).

2. During their representation of the Anderson Common Council, irreconcilable differences have arisen between the Anderson Common Council and Attorneys Laduzinsky and Schoop.

3. Granting this motion to withdraw with respect to Attorney Laduzinsky will not prejudice the Anderson Common Council, which will continue to be represented by Attorney Khoury who has an appearance on file in this matter.

4. Granting the motion will not prejudice any of the Plaintiffs because they have already

secured partial summary judgment and can work with Attorney Khoury to address the redistricting that this Court ordered be commenced in its September 30, 2024 order.

5. Granting the motion will not delay the administration of justice or the disposition of this case. The Court has already ruled on the merits of the malapportionment claim raised in Plaintiffs' Original Complaint.

6. Granting the motion will not prejudice the Plaintiffs. At the September 23, 2024 telephonic status hearing before Magistrate Judge Baker, the Plaintiffs indicated that they would likely file an Amended Complaint based on new district boundaries created by the Anderson Common Council, in 2024. If and/or when Plaintiffs file their Amended Complaint, Plaintiffs can coordinate any scheduling or other discussions necessary to the litigation with Attorney Khoury and/or any other additional counsel that the Anderson Common Council should elect to engage for this matter.

7. Undersigned counsel represents and warrants that this motion is brought in good faith and not for the purpose of causing delay or any other improper motive.

**WHEREFORE**, for the reasons set forth above, Attorney Steven M. Laduzinsky respectfully requests that this Honorable Court enter an order granting Attorney Steven M. Laduzinsky leave to withdraw his appearance as counsel of record for Defendant City of Anderson Common Council by entering the attached proposed order, which is being served on all counsel of record, including legal counsel for City of Anderson, Attorney Rosemary Khoury, by operation of the Court's ECF electronic docketing system.

Respectfully submitted,

STEVEN M. LADUZINSKY

By: /s/ Steven M. Laduzinsky  
Movant

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on December 3, 2024, the foregoing **MOTION FOR LEWAVE TO WITHDRAW AS COUNSEL OF RECORD FOR DEFENDANT CITY OF ANDERSON COMMON COUNCIL** was electronically filed with the United States District Court for the Southern District of Indiana by filing through the Court's CM/ECF system, which served a copy of the foregoing upon all counsel of record.

By: Steven M. Laduzinsky