

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION

ASHLEY DIAMOND,	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE NO.:
	)	
vs.	)	5:20-CV-453-MTT
	)	
TIMOTHY WARD, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**MOTION TO WITHDRAW**

COMES NOW the undersigned, J. Kyle Brooks, who, pursuant to Local Rule 83.1.4, respectfully requests to withdraw from this case, showing the Court as follows.

1. The undersigned was previously employed as an Assistant Attorney General by a state government agency, the Georgia Department of Law. While so employed, the undersigned appeared in this action on behalf of Defendants Timothy Ward, Sharon Lewis, Javel Jackson, Ahmed Holt, Robert Toole, Benjamin Ford, Jack Sauls, Brooks Benton, Grace Atchison, Lachesha Smith, and Rodney Jackson.
2. The undersigned resigned from the Georgia Department of Law, effective March 23, 2021. The undersigned has since entered private practice. By virtue of his resignation from the Georgia Department of Law, the undersigned is no longer representing or acting on behalf of any party in this or other litigation whom he previously represented while employed as an Assistant Attorney General.
3. Following the undersigned’s resignation, other counsel employed by the Georgia Department of Law, Robert B. Shapiro and Roger A. Chalmers, entered appearances in this action on behalf of Defendants Timothy Ward, Sharon Lewis, Javel Jackson, Ahmed Holt, Robert Toole, Benjamin Ford, Jack Sauls, Brooks Benton, Grace Atchison, Lachesha

Smith, and Rodney Jackson. *See* Docs. 42, 25. Mr. Shapiro, Mr. Chalmers, and the Georgia Department of Law will continue to represent these Defendants as the case proceeds.

WHEREFORE, for the foregoing reasons and pursuant to M.D. Ga. L.R. 83.1.4, J. Kyle Brooks respectfully requests that the Court enter an order approving his withdrawal from this action and terminating him from the docket as counsel of record for any party.

Respectfully submitted this 12<sup>th</sup> day of April, 2021.

/s/ J. Kyle Brooks

J. Kyle Brooks

Georgia Bar No. 773561

600 Peachtree Street, N.E.

Suite 3900

Atlanta, Georgia 30308

Tel: (404) 920-0341

Fax: (404) 68-2988

Email: [kbrooks@buckleybeal.com](mailto:kbrooks@buckleybeal.com)

**CERTIFICATE OF SERVICE**

I hereby certify that, on April 12, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Roger A. Chalmers  
Robert B. Shapiro  
Georgia Department of Law  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334

Maya G. Rajaratnam  
Southern Poverty Law Center  
400 Washington Avenue  
Montgomery, Alabama 36104

Annarita McGovern  
Terry L. Long  
Satcher & McGovern, LLC  
288 South Main Street  
Suite 100  
Alpharetta, Georgia 30009

Tyler Rose Clemons  
Southern Poverty Law Center  
201 St. Charles Avenue  
Suite 2000  
New Orleans, Louisiana 70170

Elizabeth Litrell  
Southern Poverty Law Center  
P.O. Box 1287  
Decatur, Georgia 30031

A. Chinyere Ezie  
Center for Constitutional Rights  
666 Broadway, 7<sup>th</sup> Floor  
New York, New York 10012

/s/ J. Kyle Brooks  
J. Kyle Brooks  
Georgia Bar No. 773561  
600 Peachtree Street, N.E.  
Suite 3900  
Atlanta, Georgia 30308  
Tel: (404) 920-0341  
Fax: (404) 68-2988  
Email: [kbrooks@buckleybeal.com](mailto:kbrooks@buckleybeal.com)