



SCHONEKAS  
EVANS  
MCGOEY &  
MCEACHIN, LLC

FILED  
2020 MAY -7 AM 11:21  
CIVIL  
DISTRICT COURT

Patrick S. McGoeys  
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May 1, 2020

VIA EMAIL

E. John Litchfield, 8622  
Berrigan Litchfield, LLC  
Suite 4204 Place St. Charles  
201 St. Charles Avenue  
New Orleans, Louisiana 70170

Re: IV Waste, LLC

Dear John:

As you know, your client, IV Waste, LLC (“IV Waste”), began garbage collections in the City of Kenner today. It has come to my attention that, in order to perform those obligations IV Waste, LLC has been accessing the roll-out carts that are the property of Ramelli Janitorial Service, Inc. (“Ramelli”) and dumping garbage from those carts into IV Waste’s trucks. IV Waste’s unauthorized use, access, and interference with Ramelli’s property is a criminal trespass and unauthorized use of movables violation of Kenner law. *See* Kenner Ord., §§ 7-90; 7-91. As you will recall, in 2017, IV Waste admonished Ramelli for accessing IV Waste’s garbage carts in the French Quarter. *See gen.* [https://www.nola.com/news/article\\_6395fe27-1685-541e-b341-686851df44d5.html](https://www.nola.com/news/article_6395fe27-1685-541e-b341-686851df44d5.html).

The same as IV Waste does not want Ramelli to use its property, Ramelli does not authorize IV Waste to access, use, or in any way interfere with any Ramelli owned roll-out carts or other receptacles to collect garbage for the City of Kenner. Please consider this letter a formal request to your client that it immediately cease and desist any further use, access, or interference with any roll-out carts or other garbage receptacles or dumpsters that are the property of Ramelli.



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Should you have any questions, please feel free to contact me.

With kind regards, I am

Sincerely,

*/s/Patrick S. McGoey*

Patrick S. McGoey

PSM/rjh

cc: Robert Ramelli (via email)  
Mike Thomas (via email)