

IN THE FORREST COUNTY CIRCUIT COURT, HATTIESBURG, MISSISSIPPI

CARTER CARROLL	FILED	PLAINTIFF
KIM BRADLEY	JAN 23 2015	PLAINTIFF
VS.	CAUSE NO.	<u>CI14-0212</u>
JOHNNY L. DUPREE	<i>Forrest County Clerk</i> FORREST COUNTY CIRCUIT CLERK	DEFENDANT

MOTION FOR RECONSIDERATION

COMES NOW, SHAWN O'HARA, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDANT; AS WELL AS, COMES NOW ELISHA "SARGE" JACKSON, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDANT; WHO HAVE BEEN DENIED THEIR LEGAL RIGHT, TO PARTICIPATE IN THIS CIVIL ACTION, ON JANUARY 12, 2015, BY THE HONORABLE JUDGE L. BRELAND HILBURN, WHO DID SERIOUSLY ERR (MADE A MISTAKE). (SEE EXHIBIT B.)

1. CERTAINLY, BOTH NAMED INTERVENORS, FILE THIS MOTION FOR RECONSIDERATION, REQUEST THE OPPORTUNITY TO ARGUE THIS CIVIL, THIS CIVIL ACTION, AND DEMAND THIS CIVIL ACTION BE TRANSFERRED TO FEDERAL COURT, AND BE TRIED BEFORE A JURY OF TWELVE FEDERAL JURORS. (SEE EXHIBIT B.)

2. FURTHERMORE, THE STATE OF MISSISSIPPI IS OPERATING WITHOUT A RATIFIED 1890 STATE CONSTITUTION, WHICH IN 125 YEARS, HAS NEVER RECEIVED EVEN ONE VOTE TO RATIFY SAID "BASTARD" STATE CONSTITUTION, THROUGH A POPULAR VOTE. IN CONTRAST, THE UNITED STATES CONSTITUTION, WHICH IS A RATIFIED CONSTITUTION, ITS SEVENTH AMENDMENT, GUARANTEES THE RIGHT TO A TRIAL BY JURY, "... where the value in controversy shall exceed twenty dollars," MEANING, A TRIAL BY JURY IS PROPER, AND SHOULD BE CONDUCTED.

3. LET THE RECORD STATE, BESIDES THE SEVERAL FEDERAL CIVIL RIGHTS VIOLATIONS, BEING COMMITTED AGAINST POLICE CHIEF FRAZIER


BOLTON; BEING COMMITTED AGAINST CITY ATTORNEY CHARLES LAWRENCE, JR.; BEING COMMITTED AGAINST CITY JUDGE PRO-TEM CAROL JONES RUSSELL; AND BEING COMMITTED AGAINST CITY PUBLIC DEFENSE ATTORNEY ALETHEA SHAW-MILTON; ALL OF WHICH ARE OUTLINED IN EXHIBIT B, AN ADDITIONAL VIOLATION IS IN PROGRESS, TO HURT THE LAST TWENTY QUARTERS OF THEIR SOCIAL SECURITY BENEFITS, IF THEY ARE SOON TERMINATED FROM THEIR CITY JOBS, AS A RESULT OF THE "HATE CRIMES" BEING COMMITTED AGAINST THEM, BY THE TWO OLD WHITE MEN, WHO WORK PART-TIME FOR THE CITY COUNCIL, WHO FILED THIS MALICIOUS CIVIL ACTION.

CONCLUSION


BOTH INTERVENORS REQUEST THIS MOTION FOR RECONSIDERATION BE GRANTED, AS WELL AS, THE JANUARY 13, 2015 ORDER, BY THE HONORABLE JUDGE L. BRELAND HILBURN, BE VACATED.

SUBMITTED BY:

JANUARY 22, 2015


SHAWN O'HARA - INTERVENOR,
"NEXT FRIEND", TAXPAYER, AND DEFENDANT
P.O. BOX 15275
HATTIESBURG, MISSISSIPPI 39404
601-434-5820

JANUARY 22, 2015


ELISHA "SARGE" JACKSON - INTERVENOR,
"NEXT FRIEND", TAXPAYER, AND DEFENDANT
P.O. BOX 1542
HATTIESBURG, MISSISSIPPI 39403
601-434-5820

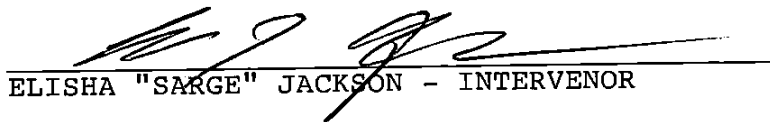
CERTIFICATE OF SERVICE

COMES NOW, SHAWN O'HARA, INTERVENOR, AND ELISHA "SARGE" JACKSON, INTERVENOR, STATING, A COPY OF THIS LEGAL DOCUMENT, WILL BE HAND-DELIVERED, OR MAILED, TO THE FOLLOWING THREE CONCERNED PARTIES, ON JANUARY 23, 2015.

WITNESS OUR SIGNATURES, ON JANUARY 23, 2015.



SHAWN O'HARA - INTERVENOR



ELISHA "SARGE" JACKSON - INTERVENOR

HONORABLE CHARLES LAWRENCE, JR.
1105 EDWARDS ST.
HATTIESBURG, MS. 39401

HONORABLE ROBERT D. GHOLSON
HONORABLE KATHERINE B. SUMRALL
P.O. BOX 1289
LAUREL, MS. 39441-1289

HONORABLE JUDGE L. BRELAND HILBURN
P.O. BOX 2114
JACKSON, MS. 39225

FILED

JAN 12 2015

EXHIBIT B

Forrest County
FORREST COUNTY CIRCUIT CLERK

IN THE FORREST COUNTY CIRCUIT COURT, HATTIESBURG, MISSISSIPPI

CARTER CARROLL	PLAINTIFF
KIM BRADLEY	PLAINTIFF
VS.	CAUSE NO. <u>CI14-0212</u>
JOHNNY L. DUPREE	DEFENDANT

PETITION TO INTERVENE

COMES NOW, SHAWN O'HARA, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDANT; AS WELL AS, COMES NOW ELISHA JACKSON, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDANT; FILING THIS LEGAL DOCUMENT, IN CONJUNCTION WITH RULE 24 (a); WHICH STATES, "... anyone shall be permitted to intervene in an action:". THUS, THE INTERVENORS WILL SHOW, SEVERAL CIVIL RIGHTS OF HATTIESBURG POLICE CHIEF FRAZIER BOLTON; CITY COURT JUDGE CAROL JONES-RUSSELL; CITY PUBLIC DEFENSE ATTORNEY ALETHEA SHAW; AND CITY ATTORNEY CHARLES LAWRENCE, JR.; HAD SEVERAL OF THEIR CIVIL RIGHTS VIOLATED.

1. THE TWO WHITE PLAINTIFFS, WHO ARE ONLY PART-TIME CITY COUNCIL MEMBERS, ARE USING ACTS OF "HATE CRIMES", TO VIOLATE THE CIVIL RIGHTS OF THE FOUR OUTSTANDING CITY EMPLOYEES, WHO DESIRE TO BE APPOINTED, TO SERVE ALL THE RESIDENTS OF HATTIESBURG. HOWEVER, BECAUSE OF THE COLOR OF THEIR SKIN, THE TWO OLD WHITE MEN ON CITY COUNCIL ARE DISCRIMINATING AGAINST THEM.

2. THE TWO WHITE PLAINTIFFS, ARE VIOLATING THE AGE DISCRIMINATION ACT OF 1967, ^{THAT} PROHIBITS ALL FORMS OF EMPLOYMENT DISCRIMINATION, ESPECIALLY AGAINST INDIVIDUALS , WHO ARE AT LEAST 40 YEARS OF AGE.

3. THE TWO WHITE PLAINTIFFS, ARE VIOLATING THE CIVIL RIGHTS ACT OF 1964, DISCRIMINATING AGAINST THE "... RACE, COLOR, CREED, SEX,

AND NATIONAL ORIGIN, OF FOUR BLACK CITY EMPLOYEES. ONE OF THOSE EMPLOYEES HAS OVER FORTY YEARS EXPERIENCE IN LAW ENFORCEMENT. THE OTHER THREE OF THOSE EMPLOYEES ARE LAWYERS.


4. THE TWO WHITE PLAINTIFFS ARE VIOLATING SEVERAL OF THE U.S. CONSTITUTIONAL RIGHTS OF THE FOUR MENTIONED BLACK CITY EMPLOYEES, INCLUDING THEIR 1ST AMENDMENT; 4TH AMENDMENT; 5TH AMENDMENT; 7TH AMENDMENT; AND 14TH AMENDMENT, U.S. CONSTITUTIONAL RIGHTS.

CONCLUSION

IT IS DEMANDED, THIS CASE IS IMMEDIATELY TRANSFERRED TO U.S. DISTRICT COURT, AS WELL AS, THE F.B.I. BE CONTACTED, AS WELL AS, THE U.S. DEPARTMENT OF JUSTICE BE CONTACTED, SINCE THE FOUR NAMED BLACK CITY EMPLOYEES, PLUS, SHAWN O'HARA, PLUS, ELISHA JACKSON, PLUS, TENS OF THOUSANDS OF RESIDENTS OF HATTIESBURG, ARE HAVING THEIR CIVIL RIGHTS VIOLATED, BY THE TWO PLAINTIFFS IN THIS CASE. A TRIAL BY JURY IS DEMANDED.


SUBMITTED BY:

JANUARY 11, 2015


 SHAWN O'HARA - INTERVENOR,
 "NEXT FRIEND", TAXPAYER, AND DEFENDANT
 P.O. BOX 15275
 HATTIESBURG, MISSISSIPPI 39404
 601-434-5820

SUBMITTED BY:

JANUARY 11, 2015


 ELISHA JACKSON - INTERVENOR,
 "NEXT FRIEND", TAXPAYER, AND DEFENDANT
 P.O. BOX 1542
 HATTIESBURG, MISSISSIPPI 39403
 601-434-5820

CERTIFICATE OF SERVICE

COMES NOW, SHAWN O'HARA, INTERVENOR, AND ELISHA JACKSON, INTERVENOR, STATING, A COPY OF THIS LEGAL DOCUMENT, WILL BE HAND-DELIVERED TO CARTER CARROLL, KIM BRADLEY, JOHNNY L. DUPREE, AND JUDGE L. BRELAND HILBURN, ON MONDAY, JANUARY 12, 2015, AS WELL AS, COPIES WILL BE PROVIDED TO ALL CONCERNED PARTIES. (PRESENTLY, LAWYERS REPRESENTING PLAINTIFFS AND DEFENDANT IS UNKNOWN.)

WITNESS OUR SIGNATURES, ON JANUARY 11, 2015.



SHAWN O'HARA - INTERVENOR



ELISHA JACKSON - INTERVENOR