IN THE FORREST COUNTY CIRCUIT COURT, HATTIESBURG, MISSISSIPPI

CARTER CARROLL

FILED

PLAINTIFF

KIM BRADLEY

JAN 23 2015

PLAINTIFF

VS.

FORREST COUNTY CIRCUIT CLERK

CAUSE NO. CI14-0212

JOHNNY L. DUPREE

DEFENDANT

## MOTION TO VACATE JANUARY 13, 2015, ORDER

COMES NOW, SHAWN O'HARA, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDAT; AS WELL AS, COMES NOW ELISHA "SARGE" JACKSON, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDANT; WHO HAS 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).

- BLACK MEN AND BLACK WOMEN, WHO WORK AS CITY EMPLOYEES, WERE NOT GIVEN THE RIGHT FOR SHAWN O'HARA, INTERVENOR, AND ELISHA "SARGE" JACKSON, INTERVENOR, TO SPEAK, IN SUPPORT OF THEIR MANY YEARS OF OUTSTANDING WORK.
- IT'S APPARENT, MISSISSIPPI IS STILL BURNING WITH RACIAL 2. HATRED. IN SPECIFIC, TWO PART-TIME WHITE MALE CITY EMPLOYEES, ARE MISUSING THEIR GOVERNMENTAL POWER, TO VIOLATE THE CIVIL RIGHTS OF BLACK MEN AND BLACK WOMEN, WHO WORK FOR THE CITY.
- WITHOUT A RATIFIED 1890 MISSISSIPPI CONSTITUTION, "HATE CRIMES" WILL CONTINUE TO BE COMMITTED, AGAINST PEOPLE OF COLOR, SINCE VIOLATIONS OF "DUE PROCESS OF LAW", AND VIOLATIONS OF "EQUAL PROTECTION UNDER THE LAW", EXISTS IN HATTIESBURG.

## CONCLUSION

IT IS DEMANDED, THIS MOTION TO VACATE ORDER BE GRANTED, SO JUSTICE AND EQUALLY CAN BE RENDERED, FOR BLACK MEN, AND BLACK

WOMEN, WHO ARE HATTIESBURG CITY EMPLOYEES.

LASTLY, THE MAYOR DOES NOT NEED TO BE FINED; IMPRISONED; OR REMOVED FROM OFFICE. INSTEAD, MISSISSIPPI NEEDS A RATIFIED STATE CONSTITUTION, BEING THE "BILL OF RIGHTS", TO PROTECT EVERYONES CIVIL RIGHTS, RATHER THAN, JUST THE RIGHTS, OF A FEW OLD MEN.

SUBMITTED BY:

JANUARY 23, 2015

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

**JANUARY 23, 2015** 

ELISHA "SARGE" ACKSON - INTERVENOR
"NEXT FRIEND" TAXPAYER, AND DEFENDANT
P.O. BOX 1542
HATTIESBURG, MS. 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