

FILED

MAY 07 2015

*Forrest Adams*  
FORREST COUNTY CIRCUIT CLERK

IN THE CIRCUIT COURT OF FORREST COUNTY, MISSISSIPPI

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


RESPONSE TO PLAINTIFFS' MOTION FOR STATUS CONFERENCE

COMES NOW, SHAWN O'HARA, INTERVENOR, STATING, HE HAS FILED THIS LEGAL DOCUMENT, STATING, DR. JOHNNY DUPREE, MAYOR, HAS FILLED 16 OF THE 17 LEADERSHIP POSITIONS IN HIS ADMINISTRATION. IN SHORT, 67% OF THE PEOPLE HE NOMINATED, NOW SERVE IN THOSE POSITIONS.

1. THIS CASE SHOULD BE DISMISSED WITH PREJUDICE.
2. IN ADDITION, THIS COURT SHOULD OFFER A WRITTEN APOLOGY, TO BOTH INTERVENORS IN THIS CASE, SINCE THE<sup>Y</sup> WERE NOT PERMITTED TO VERBALLY ARGUE THIS CASE. SEVERAL OUTSTANDING FILING<sup>S</sup> WERE MADE BY THEM. (SEE EXHIBIT 1, EXHIBIT 2, AND EXHIBIT 4.)
3. THE ATTORNEY GENERAL'S OFFICE, C/O THE HONORABLE ATTORNEY HAROLD PEZETTA, FOUND NO WRONG-DOING BY THE INTERVENORS IN THIS CASE.
4. ON THE WHOLE, THE TRIAL JUDGE WAS IN ERR, DENYING THE INTERVENORS THEIR RIGHT TO VERBALLY PARTICIPATE, IN THIS CIVIL ACTION, supporting Dr. Johnny Dupree, Mayor, as well as, SUPPORTING, SEVERAL BLACK CITY EMPLOYEES.

SUBMITTED:

MAY 7, 2015

  
SHAWN O'HARA - INTERVENOR  
P.O. BOX 15275  
HATTIESBURG, MISSISSIPPI 39404  
601-434-5820

CERTIFICATE OF SERVICE

COMES NOW, SHAWN O'HARA, INTERVENOR, STATING, A COPY OF THIS  
LEGAL DOCUMENT, WILL BE HAND-DELIVERED, TO THE FOLLOWING  
INDIVIDUALS.

WITNESS OUR SIGNATURES, ON MAY 7, 2015.



SHAWN O'HARA - INTERVENOR

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

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

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

FILED

FEB 02 2015

IN THE CIRCUIT COURT OF FORREST COUNTY, HATTIESBURG, MISS. CIRCUIT CLERK  
CARTER CARROLL, ET AL. PLAINTIFF  
VS. CAUSE NO. CI 14-0212  
JOHNNY L. DUPREE DEFENDANT

RESPONSE TO PLAINTIFFS' MOTION FOR MODIFICATION OF ORDER

COMES NOW SHAWN O'HARA, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDANT, AS WELL AS, ELISHA "SARGE" JACKSON, INTERVENOR, "NEXT FRIEND", TAXPAYER, AND DEFENDANT, FILING THIS LEGAL DOCUMENT, OBJECTING TO THE PLAINTIFFS' MOTION FOR MODIFICATION OF ORDER, BASED ON THE FOLLOWING GROUNDS.

1. BECAUSE "HATE CRIMES" EXIST IN THIS CIVIL MATTER, AGAINST FOUR OUTSTANDING BLACK CITY EMPLOYEEES, AS WELL AS, AGAINST THE MAYOR, A TRIAL BY JURY IS DEMANDED IN U.S. DISTRICT COURT.
2. AT THE LEAST, THE MISSISSIPPI SUPREME COURT RULED, IN TYSON VS. HARRISON (2006); WHEN A TRIAL BY JURY IS DEMANDED, CIRCUIT COURT IS TO PROVIDE A TRIAL BY JURY.
3. EVEN THE SEVENTH AMENDMENT OF THE U.S. CONSTITUTION, IN CONTROVERSIES OVER \$20.00; A TRIAL BY JURY SHOULD OCCUR.
4. BY THE WAY, SAID MODIFICATION WAS PREMATURELY FILED, NOT GIVING THE MAYOR PROPER TIME TO ARGUE FOR HIS LEADERSHIP DIRECTORS, TO BE APPROVED BY CITY COUNCIL.
5. PLEASE NOTE, CITY COUNCIL IS OPERATING WITHOUT A RATIFIED 1890 STATE CONSTITUTION, WHICH WAS NEVER VOTED ON BY THE PEOPLE, THROUGH A PUBLIC VOTE.

CONCLUSION


MOTION FOR MODIFICATION OF ORDER SHOULD BE DENIED.

@.


ALSO, EACH SIDE SHOULD PAY THEIR OWN COURT COSTS.

SUBMITTED BY:

FEBRUARY 1, 2015

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


FEBRUARY 1, 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, AS WELL AS ELISHA "SARGE" JACKSON, INTERVENOR, STATING, THEY WILL HAND-DELIVER, A TRUE AND ACCURATE COPY, OF THIS LEGAL DOCUMENT, ON FEBRUARY 2, 2015, TO THE FOLLOWING CONCERNED PARTIES.

WITNESS OUR SIGNATURES, ON FEBRUARY 2, 2015.

  
SHAWN O'HARA - INTERVENOR

  
ELISHA "SARGE" JACKSON - INTERVENOR

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

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

EXHIBIT 3

1 General Docket, Civil Cases, Circuit Court, FORREST COUNTY CIRCUIT COU

No. CI14-0212

CFN 23117

CARROLL CARTER  
Vs.Counsel for Plaintiff  
Robert D. Gholson  
Counsel for DefendantDUPREE JOHNNY L  
STATUTES RULES

JUDGE Robert B. Helfrich

DATE	ORDERS, JUDGMENTS, ETC.	BK/PG
11/06/2014	COMPLAINT FILED	
11/14/2014	SUMMONS ISSUED ON MAYOR JOHNNY L DUPREE AND RTA	
12/02/2014	AFFIDAVIT P/S ON JOHNNY L DUPREE ON NOVEMBER 24, 2014 AT 1:04	
12/04/2014	ORDER OF RECUSAL	
12/08/2014	PLAINTIFFS' MOTION FOR SUMMARY JUDGEMENT	
12/08/2014	PLAINTIFFS' STATEMENT OF UNDISPUTED FACTS	
12/11/2014	SUPREME COURT ORDER APPOINT SPECIAL JUDGE - HON. L. BRELAND HILBURN	
12/29/2014	ANSWER FROM MAYOR JOHNNY L DUPREE	
1/05/2015	DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGEMENT	
1/12/2015	NOTICE OF ENTRY OF APPEARANCE	
1/12/2015	PETITION TO INTERVENE	
1/15/2015	PLAINTIFF'S RESPONSE TO PETITION TO INTERVENE	
1/16/2015	ORDER-IT IS ORDERED TO APPOINT AND SUBMIT TO THE HATTIESBURG CITY COUNCIL FOR CONFIRMATION, THE NAME OF LEGALLY QUALIFIED DIRECTORS FOR ALL CITY DEPARTMENTS WHICH, AS OF THIS DATE, HAVE NOT BEEN CONFIRMED BY THE HATTIESBURG CITY COUNCIL	
1/22/2015	PLAINTIFFS' MOTION FOR MODIFICATION OF ORDER	
1/23/2015	REBUTTAL TO PLAINTIFFS' RESPONSE TO PETITION TO INTERVENE WITH EXHIBITS	
1/23/2015	MOTION FOR RECONSIDERATION	
1/23/2015	MOTION TO VACATE JANUARY 13, 2015 ORDER	
1/28/2015	PLAINTIFFS' NOTICE OF HEARING	
2/02/2015	RESPONSE TO PLAINTIFFS' MOTION FOR MODIFICATION OF ORDER	
2/02/2015	DEFENDANTS RESPONSE TO PLAINTIFF'S MOTION FOR MODIFICATION OF ORDER	
2/06/2015	ORDER GRANTING PLAINTIFFS' MOTION FOR MODIFICATION OF ORDER	
2/13/2015	NOTICE OF APPEAL WITH \$200.00 FILING FEE	
2/13/2015	DESIGNATION OF THE RECORD	
2/17/2015	CLERK'S ESTIMATE OF COST FOR APPEAL	
2/17/2015	LETTER TO HON. CHARLES LAWRENCE	
2/17/2015	LETTER TO SUPREME COURT CLERK - notice of appeal w/\$200.00 filing fee cc Judge Hilburn, Robert Gholson, Katherine Sumrall, Shawn O'Hara, Elisha Jackson & Beverly Temple	
2/17/2015	CORRECTED LETTER TO SUPREME COURT CLERK - notice of appeal cc Judge Hilburn, Robert Gholson, Katherine Sumrall, Shawn O'Hara & Elisha Jackson	
2/18/2015	CERTIFICATE OF COMPLIANCE WITH RULE 11(b)(1)	
2/23/2015	NOTICE OF SUBMISSION OF NOMINEES	
3/04/2015	DEFENDANT'S MOTION FOR STAY OR ORDER PENDING APPEAL	

No. CI14-0212

CFN 23117

CARROLL CARTER  
Vs.Counsel for Plaintiff  
Robert D. Gholson  
Counsel for DefendantDUPREE JOHNNY L  
STATUTES RULES

JUDGE Robert B. Helfrich

DATE	ORDERS, JUDGMENTS, ETC.	BK/PG
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EXHIBIT 4

MCNALLY V. U.S. 107 S. CT 2875 (1987)

BROTHERHOOD OF RAILROAD TRIALMAN V. VIRGINIA EX REL.  
VIRGINIA STATE BAR, 377 U.S., 1,7 (1964)

GIDEON V. WAINWRIGHT 372 U.S. 335  
83 S. CT. 792; 9 L. ED., 2D. 799

PICKING V. PENNSYLVANIA RAILWAY 151 E. 2D 240

BOILING V. SHARPE 347 U.S. 497 (1954)

NAACP V. SUTTON 371 U.S. 415 (1963)

SLAUGHTER-HOUSE CASES 83 U.S. (18 WALL) 36 (1873)

JOHNSON V. AVERY COMMISSIONER OF CORRECTIONS, ET AL.  
393 U.S. 483 (1969)

CHISHOLE V. GEORGIA, 2 DOLL. 419 AT 473  
PENHALLOW V. DOANE'S ADMINISTRATORS, 3 DALL. 54 AT 93

MCCULLOCK V. MARYLAND, 4 WHEAT, 316 AT 404, 405

YICK WO V. HOPKINS 118 U.S. 356 AT 370

NORTON V. SHELBY CO. NTY, 118 U.S. 425 P. 442

SOUTH CAROLINA V. UNITED STATES, 199 U.S. 437 AT 448

EXHIBIT 2

IN THE FORREST COUNTY CIRCUIT COURT, HATTIESBURG, MISSISSIPPI

CARTER CARROLL	<b>FILED</b>	PLAINTIFF
KIM BRADLEY	JAN 23 2015	PLAINTIFF
VS.	<i>Forrest County</i> CAUSE NO.	CI14-0212
JOHNNY L. DUPREE	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

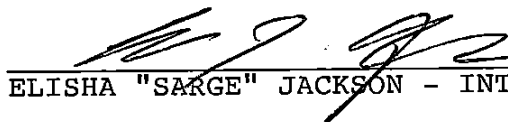
CERTIFICATE OF SERVICE

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

EXHIBIT B

FILED

JAN 12 2015

*Forrest County*  
FORREST COUNTY CIRCUIT CLERK

IN THE FORREST COUNTY CIRCUIT COURT, HATTIESBURG, MISSISSIPPI  
CARTER CARROLL  
KIM BRADLEY  
VS. CAUSE NO.  
JOHNNY L. DUPREE  
PLAINTIFF  
PLAINTIFF  
CI14-0212  
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 DISCRIMINAT-  
ION ACT OF 1967, <sup>THAT</sup> 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.

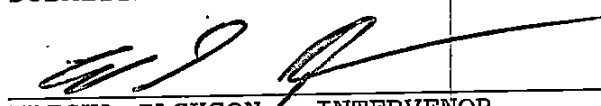
SUBMITTED BY:

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