

FILED
FEB 02 2015

FORREST

IN THE CIRCUIT COURT OF FORREST COUNTY, HATTIESBURG, MS.

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
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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
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