

RICHARD WAYNE SMITH,
MAXIE MONROE, KRISTOPHER
LANE WALKER, CANDICE
SHANELLE HUDSON,
MATTHEW KYLE NASH, SHEILA
RENEE PEPPER, AND BRIAN JAMES
GLENN

: SECOND JUDICIAL DISTRICT COURT

VS. NO. 33,116

: PARISH OF JACKSON

TOWN OF JONESBORO

: STATE OF LOUISIANA

PETITION

FILED
AUG 24 2012
Laura Culpepper
LAURA CULPEPPER, D.Y. CLERK

The petition of RICHARD WAYNE SMITH, MAXIE MONROE, KRISTOPHER LANE WALKER, CANDICE SHANELLE HUDSON, MATTHEW KYLE NASH, SHEILA RENE PEPPER, and BRIAN JAMES GLENN, residents and domiciliaries of lawful age of the Parish of Jackson, State of Louisiana, with respect shows and avers as follows:

1.

That the TOWN OF JONESBORO, a municipality located in the Parish of Jackson, State of Louisiana, is justly and truly indebted unto your petitioners for past due wages, penalty wages, damages for wrongful cancellation of insurance, damages for failure to pay into the unemployment fund, damages for wrongful termination, reimbursement for court appearances, attorney's fees and all other damages allowed by Louisiana law, for the following to-wit:

2.

That at all times pertinent herein, plaintiffs were employees of the police department of the TOWN OF JONESBORO, having been recommended for employment by the Mayor and approved by the Board of Aldermen.

3.

That plaintiffs herein were never terminated by a recommendation of the Mayor, approved by the Board of Aldermen, in violation of Louisiana law. See Opinion of the Attorney General May 10, 1974.

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4.

That the TOWN OF JONESBORO has failed to fund the police department which action affects the police department in violation of law. See Opinion of the Attorney General No. 05-0424.

5.

That the TOWN OF JONESBORO did not pay its portion into the unemployment fund of the State of Louisiana on behalf of plaintiffs, which is in violation of Louisiana law.

6.

That plaintiffs have been wrongfully terminated and plaintiffs' compensation has been wrongfully terminated.

7.

That the TOWN OF JONESBORO has illegally allowed plaintiffs' insurance to lapse without even being notified of Cobra insurance, in violation of both state and federal law.

8.

That it has been necessary for plaintiffs to employ counsel and obligate themselves for attorney's fees.

9.

That the actions of defendant herein violate La. R.S. 33:404.

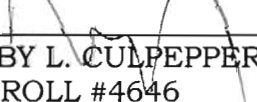
10.

That some of the above officers were required to appear in court proceedings in the Second Judicial District Court, Parish of Jackson, State of Louisiana, pursuant to subpoenas. Documentation of the court appearances were turned into the Jackson Parish Police Jury; the Jackson Parish Police Jury sent the funds for the court appearances (which were in addition to the duties of the Town of Jonesboro for which plaintiffs were compensated) to the TOWN OF JONESBORO and the TOWN OF JONESBORO has failed and refused to pay plaintiffs for court appearances.

WHEREFORE, plaintiffs pray that the foregoing petition be filed; that defendant be served with same and cited to appear and answer same and that, after all legal delays and due proceedings be had, there be judgment herein in favor of RICHARD WAYNE SMITH, MAXIE MONROE, KRISTOPHER LANE WALKER, CANDICE SHANELLE HUDSON, MATTHEW KYLE NASH, SHEILA RENEE PEPPER and BRIAN JAMES GLENN, in an amount sufficient to compensate plaintiffs for wrongful cancellation of insurance, damages for failure to pay into the unemployment fund, damages for wrongful termination, reimbursement for court appearances, attorney's fees and all other damages allowed by Louisiana law, together with legal interest from date of judicial demand until paid and all costs of these proceedings.

FURTHER PRAYS for all necessary orders and decrees and for just and equitable relief.

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PLEASE SERVE DEFENDANT:

TOWN OF JONESBORO
THROUGH HONORABLE LESLIE THOMPSON, MAYOR
128 ALLEN AVENUE
JONESBORO, LOUISIANA