

DAVID ROBERTS : SECOND JUDICIAL DISTRICT COURT
VS. NO. C-32,741 : PARISH OF JACKSON
TOWN OF JONESBORO : STATE OF LOUISIANA

PETITION FOR RULE

FILED
APR 9 2011
Laura Culpepper
LAURA CULPEPPER, D.Y. CLERK

NOW INTO COURT, through undersigned counsel, comes DAVID ROBERTS, who, with respect, shows and avers as follows:

1.

That in connection with a Judgment Debtor Examination, it has been discovered that funds from the general account of the TOWN OF JONESBORO are transferred into a payroll account.

2.

That at all times pertinent herein, plaintiff was an employee of the TOWN OF JONESBORO and should have been paid out of that account.

3.

For whatever reason, plaintiff was not paid and still has not been paid although a Judgment has been rendered.

4.

That plaintiff should be able to garnishee said account.

5.

The attorney for the TOWN OF JONESBORO takes the position that said account cannot be garnisheed.

6.

That the general account of the TOWN OF JONESBORO is account number [REDACTED] at the Jackson Parish Bank.

7.

That the payroll account is account number [REDACTED] at the Jackson Parish Bank.

8.

That a rule nisi should be issued herein ordering and directing the TOWN OF JONESBORO to show cause on a date and hour fixed by this Honorable Court

why account number [REDACTED] at the Jackson Parish Bank cannot be garnisheed in order to collect on the Judgment for past due wages.

WHEREFORE, DAVID ROBERTS prays that a rule nisi issue herein ordering and directing the TOWN OF JONESBORO to show cause on a date and hour fixed by this Honorable Court why account number [REDACTED] at the Jackson Parish Bank cannot be garnisheed in order to collect on the Judgment for past due wages.

FURTHER PRAYS after a hearing that plaintiff be allowed to garnishee said account.

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

CULPEPPER & CARROLL, PLLC
ATTORNEYS AT LAW
525 EAST COURT AVENUE
JONESBORO, LOUISIANA 71251
PHONE: (318) 259-4184

BY: 

BOBBY L. CULPEPPER
BAR ROLL #4646