

IN THE CHANCERY COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS COUNTY, MISSISSIPPI

CITY OF JACKSON, MISSISSIPPI

PLAINTIFF

VS.

CAUSE NO. 25-46

VERNON G. ARCHER AND JAKOBE JOHNSON,
INDIVIDUALLY AND D/B/A DYNAMIC LOUNGE
& GRILL A/K/A DYNAMIC LOUNGE 601

DEFENDANTS

TEMPORARY RESTRAINING ORDER

THIS MATTER came on for hearing on the Emergency *Ex Parte* Motion for Temporary Restraining Order [D6] filed by the City of Jackson, Mississippi ("City"), and the Court having been advised in the premises and having reviewed the motion and supporting documentation, finds that the motion is well-taken and should be granted, and the Court orders as follows:

1. That this Court has jurisdiction over the parties and subject matter alleged herein.
2. That this matter is currently scheduled for a hearing on February 4, 2025, at 9:00 a.m.
3. That the City is in need of this *ex parte* Temporary Restraining Order against the Defendants to prohibit the Defendants temporarily from continued operation of a nightclub referred to as Dynamic Lounge and Grill ("Dynamic Lounge"), which is located at 2512 J. R. Lynch Street, Jackson, Mississippi 39209.
4. That an *ex parte* Temporary Restraining Order is necessary because urgent and necessitous circumstances exist to temporarily prevent Dynamic Lounge from continued operation.
5. That the City has provided preliminary proof to this Court of various dangerous and illegal activities occurring at Dynamic Lounge, which include gunshots, fights, aggravated assaults, loud noises late at night, disorderly conduct, and other illegal activity constituting a public nuisance.

6. That the City has provided preliminary proof of shootings at the Dynamic Lounge on January 4, 2025, and January 15, 2025.

7. That the City has provided preliminary proof that Dynamic Lounge is operating without any sort of privilege license and has never been permitted as a nightclub.

8. That these illegal and violent occurrences, including ongoing shootings, have the potential to cause immediate and irreparable harm to the public and the City without a temporary restraining order.

9. That the City has moved for a temporary restraining order to be issued to prevent any further club operation and additional shootings until this matter can be resolved by the Court at the hearing currently scheduled on February 4, 2025.

10. That the City has alleged sufficient facts, supported by sufficient documents and exhibits, for a finding of a substantial likelihood of success on the merits.

11. That the general public could suffer irreparable injury if Dynamic Lounge continues to remain open prior to the hearing scheduled for February 4, 2025.

12. That the injury to the general public is not outweighed by injury, if any, to Defendants.

13. That any requirement of the City to post a bond in this matter is hereby waived.

14. That prior notice to Defendants of the instant Emergency *Ex Parte* Motion for Temporary Restraining Order [D6] or of any *ex parte* hearing is not required due to the emergent and necessitous nature of this matter where time is of the essence, and where the City and the public could incur immediate and irreparable injury, which justifies *ex parte* relief.

IT IS THEREFORE ORDERED AND ADJUDGED that Defendants, Vernon G. Archer and Jakobe Johnson, Individually and d/b/a Dynamic Lounge and Grill a/k/a Dynamic Lounge 601, are hereby enjoined from operation of any business activities on the property located at 2512 J. R. Lynch Street, Jackson, Mississippi 39209, and the property shall remain temporarily closed to public business until this Court's hearing on February 4, 2025, at 9:00 a.m., at the Hinds County Chancery Court, 316 South President Street, Jackson, Mississippi 39201.

IT IS FURTHER ORDERED that no bond shall be set or required in this matter at this time.

SO ORDERED AND ADJUDGED on this the 23rd day of January, 2025,
at 10:15 am.

Tiffany Grove
CHANCELLOR

Prepared and submitted by:

/s/ Jason L. Nabors
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