

**IN THE DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**MICHAEL DOBBS LAND, FAMILY BARBER  
SHOP, DONNA JOHNSON ROBERTS,  
MATTHEW JAMES SHREVE, SANDY  
HARDACRE, NAKOSHA JEAN BEALL and  
CHRISTIE SHEDD RAMSEY**

**PLAINTIFFS**

**Civil Action No. \_\_\_\_\_**

**v.**

**GOVERNOR TATE REEVES, in his Official  
Capacity; MAYOR MARY HAWKINS-BUTLER,  
in her Official Capacity; and JOHN DOES 1-10**

**DEFENDANTS**

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**COMPLAINT FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF AND DAMAGES  
(JURY TRIAL REQUESTED)**

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**COME NOW**, Mike Land, Family Barber Shop, Donna Johnson Roberts, Matthew James Shreve, Sandy Hardacre, Nakosha Jean Beall and Christie Shedd Ramsey and file this, their Complaint for Temporary Restraining Order and Preliminary and Permanent Injunctive Relief and Damages against the Defendants, Governor Tate Reeves, in his Official Capacity and Mayor Mary Hawkins-Butler, in her Official Capacity; and John Does 1-5 who are individuals or entities that have or may have contributed to the causes of action which arise hereunder; and would show unto the Court the following:

**INTRODUCTION**

1. In the wake of the novel coronavirus, the State of Mississippi, through Governor Reeves, hastily introduced a number of executive orders to slow the spread of COVID-19. While the orders may be well-intentioned, they have eviscerated the constitutional rights

of Plaintiffs.

2. Notwithstanding that the executive orders violate Plaintiffs' constitutional rights, as discussed further below, they have financially crippled the Plaintiffs. Because of the Governor's irrational, indefensible and insulting executive orders, declaring certain business to be essential and non-essential, Plaintiffs may never financially recover from the Governor's orders.

3. When Michael Land ("Land"), owner of Family Barber Shop, could not wait any longer to reopen his shop, and to allow his staff to get back to work to earn a much needed living and to take care of their families, he made the decision to go back to work and open his shop all the while taking all necessary precautions to not put any of his staff or clients at increased risk for COVID-19. At that time, whoever wanted to work at his shop was allowed to work as long as they took necessary precautions, including wearing a face mask and gloves.

4. But the Mayor took it upon herself to order the Madison Police Department to shut Land down, furthering the constitutional violations of the Governor's executive order and adding insult to injury. *See* Exhibit "1", Letter from the City of Madison signed by Defendant Hawkins-Butler.<sup>1</sup>

5. As such, Plaintiffs bring this action challenging the constitutionality of the Defendants' actions, which have deprived them of numerous rights, privileges, immunities

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<sup>1</sup> The letter references a city in Sweden – Solleftea. This is Madison's "sister city". Sweden is taking a completely different approach to the pandemic and news report show that its population is over 10 million and that Sweden has had more than 2,500 deaths associated with the virus. However, the death rate in Sweden is "significantly lower than Europe's worst-hit countries", which have been locked down. *See* <https://www.businessinsider.com/coronavirus-what-life-is-like-sweden-with-no-lockdown-guidelines-2020-5>. It is sad that as the most-free country on earth, the United States is forcing its citizens to become reliant on the government for basic needs and refusing to let those who want to work, work. Perhaps there is more to learn from Sweden.

and liberties under both the United States Constitution and the Mississippi Constitution. In doing so, Plaintiffs seek the following: 1) equitable and injunctive relief to enjoin the enforcement of the Governor's orders and the Mayor's enforcement; 2) declaratory relief from this Court in declaring that the Governor's orders violate the Plaintiffs' civil rights under 42 U.S.C. § 1983 of the Federal Civil Rights Act; the Due Process and Equal Protection Clauses of the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the United States Constitution; the Freedom of Speech Clause of the 1<sup>st</sup> Amendment of the United States Constitution; and Article 3, Sections 13, 14, 17; attorneys' fees and costs for work done by Plaintiffs' counsel in connection with this lawsuit in an amount according to proof; and for such other and further relief as is warranted and the Court deems appropriate.

#### **JURISDICTION AND VENUE**

6. This action arises 42 U.S.C. § 1983 in relation to Defendants' deprivation of Plaintiffs' constitutional rights to freedom of speech, due process and equal protection rights under the 1<sup>st</sup>, 5<sup>th</sup> and 14<sup>th</sup> Amendments to the United States Constitution. Accordingly, this Court has federal question jurisdiction under 28 U.S.C. §§ 1331 and 1343. This Court has authority to award the requested declaratory relief under 28 U.S.C. § 2201; the requested injunctive relief and damages under 28 U.S.C. § 1343(a); and attorneys' fees and costs under 42 U.S.C. § 1988.

7. The Southern District of Mississippi is the correct venue for this action because it is the District in which the Defendants maintain offices and/or do substantial official government work in, exercise their authority in their official capacities, and continue to enforce the executive orders; and is the District in which substantially all of the events giving rise to the claims occurred.

## PARTIES

8. Plaintiff Michael Dobbs Land owns and runs Family Barber Shop. He is an adult male citizen of the State of Mississippi and has owned Family Barber Shop for the last 21 (twenty-one) years. Land's business is licensed for both a barbers shop and cosmetology. Land has applied for unemployment and has only received two (2) weeks' worth of unemployment. He has three children and cares for one at home.

9. Plaintiff, Family Barber Shop is Mike Land's business, d/b/a as Family Barber Shop, located in Madison, Mississippi and is the location where all Plaintiffs practice their art.

10. Plaintiff Donna Johnson Roberts ("Roberts") is an adult female citizen of the state of Mississippi and is a licensed cosmetologist. She has been without income for the last six (6) weeks. She is widowed and has no spouse to rely upon for additional income. She additionally takes care of her disabled mother. Roberts has applied for unemployment but has not yet received it.

11. Plaintiff Nakosha Jean Beall ("Beall") is an adult female citizen of the State of Mississippi and a licensed barber. She is not married and has three children whom she supports. She has applied for unemployment, but has not yet received it. She has been without income for six (6) weeks.

12. Plaintiff Sandy Hardacre ("Hardacre") is an adult female citizen of the State of Mississippi and a licensed barber. She is married and has two children. She has not applied for any unemployment. She assists her nephew with bills as he is in the military and school.

13. Plaintiff Matthew Thomas Shreve ("Shreve") is an adult male citizen of the State of Mississippi. He is a licensed barber and has been without income or work since the

middle of March 2020. He is married and has one child that he takes care of. He is in the process of applying for unemployment.

14. Plaintiff Christie Shedd Ramsey (“Ramsey”) is an adult female citizen of the State of Mississippi. She is a licensed barber and has been without income or work since March 22, 2020. She has recently received unemployment benefits on April 29, 2020.

15. Defendant Governor Tate Reeves (“Governor”) is the Governor of the State of Mississippi, is sued in his official capacity, and is responsible for the Executive Orders complained about herein. Governor may be served with process by serving a copy of the summons and complaint to the Attorney General of the State of Mississippi pursuant to Rule 4 of the Mississippi Rules of Civil Procedure at 550 High Street, Suite 1200, Jackson, MS 39205. A courtesy copy of the Complaint will be emailed to him at [governor@govreeves.ms.gov](mailto:governor@govreeves.ms.gov).

16. Defendant Mayor Mary Hawkins (“Mayor”) is the Mayor of Madison, Mississippi, is sued in her official capacity, and is responsible for the enforcement action taken against Family Barber Shop, Mike Land, and the threats to other stylists as demonstrated in Exhibit “1”. Mayor may be served with process by serving her or her designee at 1004 Madison Avenue, Madison, MS 39110. A courtesy copy of this Complaint will be emailed to her at [Mayor@madisonthecity.com](mailto:Mayor@madisonthecity.com) and to her legal department at [cbrannon@madisonthecity.com](mailto:cbrannon@madisonthecity.com).

17. Defendants John Does 1-10 are individuals, entities or agents who are yet unknown to Plaintiffs who has or may have liability in this matter. Plaintiffs request this Court to grant leave to amend the Complaint to add those parties when they are identified and have the Amended Complaint relate back to the original filing.

## FACTS

18. On March 14, 2020, the Governor issued a Proclamation declaring a State of Emergency in the State of Mississippi as a result of COVID-19.

19. On March 23, 2020, the Governor issued Executive Order No. 1463 (“EO 1463”) effective until April 17, 2020, purporting to order Mississippians to “avoid social and other non-essential gatherings in groups of more than 10 people” (but not applying this limitation to airports, medical and healthcare facilities, retail shopping, grocery and department stores, offices, factories, and others). Restaurants, bars and other dining establishment were permitted to stay open if they would allow no more than 10 people to be gathered in the same place.

20. The Governor’s EO 1463 was promulgated pursuant to Miss. Code Ann. § 33-15-11(c)(4).

21. EO 1463 listed essential businesses to include, *inter alia*, the government, hospitals, fuel, grocery, supermarkets, bars, liquor stores, legal services, construction, and other business. Barbershops and hair stylists are not included on the “essential businesses” list.

22. EO 1463 was supplemented on March 26, 2020.<sup>2</sup> This supplementation is a clarifying order, stating that local governments can’t be less restrictive than the Governor’s Orders.

23. On March 31, 2020, the Governor issued Executive Order No. 1465 (“EO 1465”) which ordered Lauderdale County to “Shelter in Place”.<sup>3</sup>

24. The next day, April 1, 2020, the Governor issued Executive Order No. 1466 (“EO

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<sup>2</sup> <https://www.sos.ms.gov/content/executiveorders/ExecutiveOrders/SupplementEO1463.pdf> (last accessed May 3, 2020).

<sup>3</sup> <https://www.sos.ms.gov/content/executiveorders/ExecutiveOrders/1465.pdf> (last accessed May 3, 2020).

1466”) instituting a statewide “Shelter in Place” effective at 5PM Friday, April 3, 2020 until 8AM Monday, April 20, 2020.<sup>4</sup>

25. On April 17, 2020, the Governor extended his “Shelter in Place” order via Executive Order No. 1473.<sup>5</sup> This extends “Shelter in Place” until 8AM Monday, April 27, 2020. The Governor allowed some business to allow retail sales by drive through, curbside, or delivery services. Barbering and hair styling is still shut down. Ironically, while people are out of work and the Governor is financially crippling his citizens through these orders, recreational boating is now allowed to the extent 50% occupancy of the boat is followed. “Essential Activities” was amended to “permit recreational boating, fishing and use of beaches...”

26. On April 24, 2020, the Governor issued his “Safer at Home” Executive Order 1477 (“EO 1477”). Salons and barber shops are still closed. Liquor stores are still open. Golf courses are open and never appear to have been shuttered. This order is to remain in effect until May 11, 2020.

27. Arkansas is opening barber shops and salons as of May 6, 2020. Arkansas sets forth reasonable rules and regulations as to how those shops can open.<sup>6</sup> Plaintiffs could and would follow these recommendations should they be allowed to reopen immediately.

28. Oklahoma allowed barber shops and salons on April 24, 2020 as long as they followed strict sanitation procedures.<sup>7</sup> As of May 3, 2020, Oklahoma has 3,851 cases and

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<sup>4</sup> <https://www.sos.ms.gov/Education-Publications/ExecutiveOrders/1466.pdf> (last accessed May 3, 2020).

<sup>5</sup> <https://www.sos.ms.gov/content/executiveorders/ExecutiveOrders/1473.pdf> (last accessed May 3, 2020).

<sup>6</sup> <https://www.healthy.arkansas.gov/images/uploads/pdf/FinalCosmetology-UPDATED-05220.pdf> (last accessed 5.3.2020).

<sup>7</sup> <https://www.koco.com/article/watch-gov-stitt-providing-update-on-oklahoma-coronavirus-response/32240016#> (last accessed 5.3.2020).

has had 238 deaths.

29. Georgia allowed hair salons and barber shops, fitness centers and massage therapy centers to reopen on April 24. As of May 2, 2020, Georgia had 28, 331 cases and 1,175 deaths.<sup>8</sup>

30. Mississippi has listed 7,441 cases, as of May 3, 2020 and 291 reported deaths.<sup>9</sup>

31. Plaintiffs were, under penalty of fine and imprisonment, ordered to cease work and cease providing themselves and their families a living. Their business has been commandeered by the State of Mississippi under Governor Reeves' Executive Orders and ordered shut down.

32. None of the Plaintiffs have been compensated due to the commandeering and Plaintiffs have been out of work for approximately six (6) weeks.

33. While "essential" businesses, including liquor stores and abortion providers, were allowed to continue to operate and turn a profit, Plaintiffs' "non-essential" services have suffered immensely at the hands of government overreach and unconstitutionally restrictive orders passed and enforced by Defendants which have had immense disparate impact across their businesses.

34. Plaintiffs have standing to bring this action since they are aggrieved businesses that are the subject of the overbroad and unconstitutional Executive Orders, which have the effect of forcing Plaintiffs, and all similarly situated, to bear a public burden by entirely eviscerating their ability to operate their respective businesses.

35. Defendants' Orders and enforcement of those Orders violates Plaintiffs

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<sup>8</sup> <https://www.augustachronicle.com/news/20200502/may-2-georgia-at-28331-covid-19-cases-1175-deaths> (last accessed 5.3.2020).

<sup>9</sup> [https://msdh.ms.gov/msdhsite/\\_static/14,0,420.html](https://msdh.ms.gov/msdhsite/_static/14,0,420.html) (last accessed 5.3.2020).

constitutional rights as follows:

- a. Under the First Amendment to the United States Constitution as Plaintiffs have a freedom of speech interest in their expressive conduct in styling hair.
- b. Under the Due Process and Equal Protection clauses of the Fifth and Fourteenth Amendments in that they unconstitutionally and disparately apply one set of rules to businesses arbitrarily deemed “essential” versus other businesses (such as Plaintiffs’) that are deemed “non-essential”. Plaintiffs believe that all businesses in Mississippi are essential to the health, welfare and well-being of its citizens, and that the general health outcome sought through the passage of these orders could be accomplished through vastly less restrictive means.
- c. The Orders amount to an impermissible taking in violation of the Takings Clause of the Fifth Amendment, in that the prohibition of Plaintiffs’ operation of their “non-essential” businesses constitutes a regulatory taking of private property, for public purpose, without providing just compensation therefor. The Orders violate the Takings Clause of the Fifth Amendment in that the complete prohibition on the business operations of Plaintiffs’ businesses constitutes an irrational, arbitrary and capricious law bearing no rational basis to the state governmental interest. This shutdown has crippled Plaintiffs’, and all similarly situated, businesses in the State of Mississippi.
- d. The Orders violate the substantive and procedural due process clauses of the Fifth and Fourteenth Amendments to the United States Constitution.
- e. The Orders further violate Article 3, Sections 13, 14, 17 of the Constitution of the State of Mississippi.

36. The Executive Orders are not narrowly tailored to further the stated governmental interest. Defendants allow other businesses to operate and have granted numerous exceptions to the bans on gatherings and conduct, including for “essential” businesses and activities, which Defendants should be mandated to allow for Plaintiffs as Plaintiffs’ businesses can adhere to social distancing guidelines and best practices sanitation and disinfecting procedures as the other “essential” businesses.

37. But, instead of trying to help the citizens of Mississippi, these Orders have crippled the so-called “non-essential” businesses, including Plaintiffs’. Plaintiffs’ have a liberty interest and economic interest in being allowed to practice their profession. Plaintiff Mike Land and Family Barber Shop have received a shut down order by the Madison Police Department on the Mayor’s order due to their violation of the Governor’s Orders.

38. All Plaintiffs want to work. All Plaintiffs will comply with the guidelines, but they do not want to be jailed for trying to work and provide a living for themselves and their families.

39. Further, no Plaintiff has been sick with the coronavirus, nor has anyone at Family Barber Shop been sick with the coronavirus.

40. Additionally, US Attorney General, William P. Barr stated that if citizens filed lawsuits against their states over these order, the Justice Department will “take a look at it” and “take a position” if it seems justified.<sup>10</sup> The Justice Department did get involved in a case in the Northern District of Mississippi, filing a Statement of Interest in support of the church’s lawsuit again Greenville because churches were deemed “non-essential” by the

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<sup>10</sup> <https://www.cbsnews.com/news/william-barr-attorney-general-coronavirus-shutdown-legal-action-threats/> (last accessed May 3, 2020).

mayor of Greenville.<sup>11</sup>

41. As such, a copy of this Complaint is being sent to the US Justice Department and a certification to that effect is included at the end of this Complaint.

**COUNT I**  
**Violation of the Fifth Amendment**

42. Plaintiffs readopt and reassert all allegations set forth previously.

43. While not explicitly defined in the U.S. Constitution, the Supreme Court has “acknowledged that certain unarticulated rights are implicit in enumerated guarantees. ... Yet these important but unarticulated rights [association, privacy, presumed innocent, etc.] have nonetheless been found to share constitutional protection in common with explicit guarantees.” *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555, 579-580 (1980).

44. The right to travel is a part of the liberty of which the citizen cannot be deprived without the due process of law under the Fifth Amendment.” *Kent v. Dulles*, 357 U.S. 116, 127 (1958).

45. Courts have found that “[f]reedom of movement is kin to the right of assembly and to the right of association. These rights may not be abridged. *Aptheker v. Secretary of State*, 378 U.S. 500, 520 (1964).

46. Requiring Plaintiffs to abstain from conducting business operations, even those in compliance with the CDC’s social distancing guidelines, violates Plaintiffs’ Constitutional right to travel.

47. When a government practice restricts fundamental rights like the right to travel, it is subject to “strict scrutiny” and can be justified only if it furthers a compelling

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<sup>11</sup> <https://www.cbsnews.com/news/justice-department-church-greenville-mississippi-coronavirus-order/> (last accessed May 3, 2020).

government purpose, and, even then, only if no less restrictive alternative is available. *See, e.g. Memorial Hospital v. Maricopa County*, 415 U.S. 250, 257-258 (1974); *Dunn v. Blumstein*, 405 U.S. 330, 339-341 (1972); *Shapiro v. Thompson*, 394 U.S. 618, 89 (1969), *Maier v. Roe*, 432 U.S. 464, 488 (1977).

48. Plaintiffs have no adequate remedy at law and will suffer serious and irreparable harm to their constitutional rights unless Defendants and their officers and agents, are enjoined from implanting and enforcing the Orders as applied and facially against Plaintiffs.

**COUNT II**  
**Violations of Plaintiff's First Amendment Right to Freedom of Speech**

49. Plaintiff readopts and reasserts all allegations set forth previously.

50. Plaintiffs are hair stylists and barbers. They are licensed and engage in protected expressive conduct and “speech” through their work as hair stylists. They take a customer’s order, be it a coloring of the hair, a certain cut the customer wants, or in many cases, the customer will leave it up to the stylist/barber’s creativity.

51. The Defendants are violating the Plaintiffs’ First Amendment rights as they are no longer allowed to exercise this right due to the Orders and the enforcement of these Orders.

**COUNT III**  
**Due Process Clause of the Fourteenth Amendment**

52. Plaintiff readopts and reasserts all allegations set forth previously.

53. Plaintiffs have a fundamental property interest in conducting lawful business activities that are protected by the Due Process Clause of the Fourteenth Amendment.

54. The Orders and Defendants’ enforcement thereof, violate Plaintiffs’ substantive due process rights secured by the Fourteenth Amendment to the U.S. Constitution. Under

the Due Process Clause of the Fourteenth Amendment, no State shall “deprive any person of life, liberty, or property, without due process of law.” The fundamental liberties protected by this Clause include most of the rights enumerated in the Bill of Rights. *See Duncan v. Louisiana*, 391 U.S. 145, 147–149 (1968). In addition, these liberties extend to certain personal choices central to individual dignity and autonomy, including intimate choices that define personal identity and beliefs. *See, e.g., Eisenstadt v. Baird*, 405 U.S. 438, 453 (1972); *Griswold v. Connecticut*, 381 U.S. 479, 484–486 (1965).

55. Defendants’ Orders, which expressly deprive Plaintiffs of their rights and liberties in lawfully operating their businesses by ordering the closure of “Non-Essential” businesses, did not afford Plaintiffs with a constitutionally adequate hearing to present their case for their businesses to not be shut down. At a minimum, Plaintiffs aver that they should have been able to decide for themselves whether to “shut down” if their businesses / business models were not equipped to properly deal with health and safety guidelines issues by the federal and Mississippi state governments in connection with the COVID-19 crisis.

**COUNT IV**  
**Violation of the Equal Protection Clause of the Fourteenth Amendment**

56. Plaintiff readopts and reasserts all allegations set forth previously.

57. The Equal Protection Clause functions as a constitutional guarantee that no person or group will be denied the protection of the law that is enjoyed by similar persons or groups.

58. The Orders and Defendants’ enforcement of said Orders violate the Fourteenth Amendment, facially and as-applied to Plaintiffs. The Fourteenth Amendment requires the state to govern impartially and to not draw arbitrary distinctions between businesses bases solely on distinctions that are irrelevant to legitimate governmental interests.

59. Essential businesses can continue to operate and make money for their family. Non-essential businesses have been arbitrarily given an economic death sentence. Defendants Orders and enforcement of those Orders cannot satisfy heightened scrutiny because their arbitrary classification is not sufficiently or narrowly tailored to the stated objective.

**COUNT V**  
**Violation of the Takings Clause of the Fifth Amendment**

60. Plaintiff readopts and reasserts all allegations set forth previously.

61. The Supreme Court has long held that “the Fifth Amendment...was designed to bar Government from forcing people alone to bear public burdens which, in all fairness and justice, should be borne by the public as a whole.” *See Armstrong v. United States* (1960) 364 U.S. 40, 49.

62. While Mississippi’s police power is inherent in a sovereign government and reserved specifically by the Tenth Amendment, it is not without limit.

63. Defendants’ Orders and the enforcement thereof has caused both a complete and total regulatory and physical taking of Plaintiffs’ property without just compensation in violation of the Takings Clause of the Fifth Amendment to the U.S. Constitution. At a minimum, the effect of Defendants’ Orders constitutes a “partial” taking under the *Penn Central* three-factor test. *See Penn Central Trans. Co. v. City of New York*, 438 U.S. 104, 124 (1978). As a result, Defendants’ blatant violation of the Takings Clause of the 5<sup>th</sup> Amendment has caused proximate and legal harm to Plaintiffs.

**COUNT VI**

**Violation of the Mississippi Constitution Article 3, Sections 13, 14, 17**

64. Plaintiff readopts and reasserts all allegations set forth previously.

65. Article 3, Section 13 of the Mississippi Constitution provides, in part, that “The freedom of speech and of the press shall be held sacred...” Defendants violate Plaintiffs protected speech as discussed *supra*, and incorporated herein.

66. Article 3, Section 14 of the Mississippi Constitution provides that “No person shall be deprived of life, liberty, or property except by due process of law.” Plaintiffs have been deprived of liberty and property and have had no meaningful due process available to them. Plaintiffs cannot operate their businesses under threat of fine and prison! For styling and cutting hair even though they are licensed to do so and have been trained in sanitation and disinfection procedures by their respective license boards.

67. Article 3, Section 17 of the Mississippi Constitution provides, in part, that “Private property shall no be taken or damaged for public use, except on due compensation being first made to the owner or owners thereof, in a manner prescribed by law...”

68. Defendants’ Orders and enforcement thereof is a de facto taking of Plaintiffs’ property, for public use, without compensation, and violates Article 3, Section 17.

**COUNT VII**  
**Violation of Miss. Code Ann. 33-15-11(c)(3)**

69. Plaintiff readopts and reasserts all allegations set forth previously.

70. Miss. Code Ann. 33-15-11 provides the basis for the Governor’s Orders. It is referenced in his Orders.

71. Miss. Code Ann. 33-15-11(c)(3) provides that the Governor has power to “commandeer or utilize any private property if necessary to cope with a disaster or emergency, provided that such private property so commandeered or utilized shall be paid

for under terms and conditions agreed upon by the participating parties. The owner of said property shall immediately be given a receipt for the said private property and said receipt shall serve as a valid claim against the Treasury of the State of Mississippi for the agreed upon market value of said property.”

72. The Governor has done just this. He has commandeered all non-essential businesses, including and specifically Plaintiffs’ businesses without an agreement of the market value of said property.

73. He has done so through shutting these businesses down, for the purpose of “flattening the curve” and stopping interaction of individuals.<sup>12</sup>

74. As such, Defendant is liable to Plaintiff in the amount of “market value” for the time that Defendant has commandeered their businesses.

### **REQUESTED RELIEF**

WHEREFORE, Plaintiffs request that this Court:

- 1) Issue a declaratory judgment with the following:
  - a. Declare the Executive Orders unconstitutional, facially and as-applied to Plaintiffs, as to the First Amendment; as to the Fifth Amendment; as to the Fourteenth Amendment; contrary to the constitutional right, power, privilege, or immunity in violation of the United States and/or Mississippi Constitutions;
- 2) Set aside and hold unlawful Defendant’s Orders and the Mayor’s enforcement of those Orders both facially and as-applied to Plaintiffs;

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<sup>12</sup> This is somewhat of a dubious intent, as major supermarkets continue to be open and operating. A simple drive around town will demonstrate that these supermarkets and retail outlets are busier than ever with packed parking lots.

- 3) Permanently enjoin Defendants and all persons and entities in active concert or participation with them, including local and state law enforcement from enforcing or implementing their Orders until this Court decides the merits of this lawsuit;
- 4) Award Plaintiffs damages arising out of their Section 1983 claims for the violation of their constitutional rights;
- 5) Award Plaintiffs reasonable market value of their commandeered businesses as required by Miss. Code Ann. 33-15-11;
- 6) Award Plaintiffs their costs and attorneys' fees incurred in this action; and
- 7) Grant all such other relief as the Court may deem just and proper.

**PLAINTIFF RESPECTFULLY REQUEST A JURY TRIAL ON ALL COUNTS  
SO TRIABLE**

Dated: May 3, 2020.

Respectfully Submitted,

*/s/ Stephen D. Stamboulieh*

Stephen D. Stamboulieh  
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P.O. Box 4008

Madison, MS 39130

(601) 852-3440

[stephen@sdslaw.us](mailto:stephen@sdslaw.us)

MSB# 102784

*Counsel for Plaintiffs*

**CERTIFICATION AS TO DELIVERY TO THE  
UNITED STATES ATTORNEY GENERAL**

I, Stephen D. Stamboulieh, hereby certify that on the date of the filing, I sent to the United States Attorney General, William P. Barr, by first class mail, postage prepaid to the following:

US Attorney General  
US Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 205300-0001

Date: May 3, 2020

*/s/ Stephen D. Stamboulieh*  
Stephen D. Stamboulieh



# CITY OF MADISON

Mary Hawkins Butler

Mayor

mayor@madisonthecity.com

1004 MADISON AVENUE ♦ POST OFFICE BOX 40 ♦ MADISON, MISSISSIPPI 39130-0040 ♦ (601) 856-7116 ♦ FAX (601) 853-4766

April 28, 2020

**VIA ELECTRONIC DELIVERY TO**  
**MIKELAND8181@GMAIL.COM AND**  
**FEDERAL EXPRESS**

Family Barber Shop  
Attn: Mike Land  
211 Hoy Road  
Madison, Mississippi 39110

**RE: Violation of Executive Order 1477**

Dear Mr. Land:

We have received numerous calls from citizens expressing concern over your ongoing provision of prohibited personal services. Please allow this letter to serve as notice that your activities violate Section I(h)(ix) of Executive Order 1477, signed by Governor Tate Reeves on April 24, 2020, which provides as follows:

Fitness and exercise gyms, dance studios, clubs, tattoo parlors, spas, salons, barber shops, and all other personal care and personal grooming facilities shall remain closed to the public but may continue Minimum Operations limited to retail sales by drive-thru, curbside and/or delivery services pursuant to Paragraph I(d)(ii) of Executive Order 1466, as amended by Paragraph I(a) of Executive Order 1473.

On Friday, April 25, in response to your inquiry, you were advised of the provisions in the Governor's Order. Please be a respectful business owner and discontinue all prohibited activities, to include, without limitation, shaving and cutting hair of your customers, until such time as they are allowed by the State of Mississippi. The City of Madison is charged with the enforcement of this Executive Order and your continued violation will subject not only you, but other individuals, whether they are independent operators renting space from you, or employees in your business to penalties as set forth in *Miss. Code Ann. Sec. 33-15-43*. I have enclosed a copy of the Governor's Order for your reference.

Should you have any questions, please let me know.

Thank you,

Mary Hawkins-Butler  
Mayor

Gene Waldrop  
Chief, Madison Police Department

Enclosure: (as stated)

**Exhibit "1"**



MAYOR  
Mary Hawkins Butler

CITY CLERK/DIRECTOR  
Susan B. Crandall

BOARD OF ALDERMEN  
AT LARGE  
Warren Strain

WARD I  
Tawanna Tatum

WARD II  
Patricia H. Peeler

WARD III  
Ken Jacobs

WARD IV  
Paul Tankersley

WARD V  
Michael L. Hudgins

WARD VI  
Guy Bowering



UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

Michael Dobbs Land, et al.

Plaintiff(s)

v.

Governor Tate Reeves, in his official capacity, et al.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Governor Tate Reeves
c/o Attorney General Lynn Fitch
550 High Street, Suite 1200
Jackson, MS 39205

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Stephen D. Stamboulieh
Stamboulieh Law, PLLC
P.O. Box 4008
Madison, MS 39130
601-852-3440

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

Michael Dobbs Land, et al.

Plaintiff(s)

v.

Governor Tate Reeves, in his official capacity, et al.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Mayor Mary Hawkins-Butler
1004 Madison Avenue
Madison, MS 39110

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Stephen D. Stamboulieh
Stamboulieh Law, PLLC
P.O. Box 4008
Madison, MS 39130
601-852-3440

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**  
 Michael Dobbs Land; Family Barber Shop; Donna Johnson Roberts;  
 Matthew James Shreve; Sandy Hardacre; Nakosha Jean Beall; Christie  
 Shedd Ramsey

**(b)** County of Residence of First Listed Plaintiff Madison  
*(EXCEPT IN U.S. PLAINTIFF CASES)*

**(c)** Attorneys *(Firm Name, Address, and Telephone Number)*  
 Stephen D. Stamboulieh  
 Stamboulieh Law, PLLC  
 P.O. Box 4008, Madison, MS 39130 601-852-3440

**DEFENDANTS**  
 Governor Tate Reeves; Mayor Mary Hawkins-Butler

County of Residence of First Listed Defendant Hinds  
*(IN U.S. PLAINTIFF CASES ONLY)*

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
 THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

**II. BASIS OF JURISDICTION** *(Place an "X" in One Box Only)*

1 U.S. Government Plaintiff

3 Federal Question *(U.S. Government Not a Party)*

2 U.S. Government Defendant

4 Diversity *(Indicate Citizenship of Parties in Item III)*

**III. CITIZENSHIP OF PRINCIPAL PARTIES** *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** *(Place an "X" in One Box Only)*

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN** *(Place an "X" in One Box Only)*

1 Original Proceeding   
 2 Removed from State Court   
 3 Remanded from Appellate Court   
 4 Reinstated or Reopened   
 5 Transferred from Another District *(specify)*   
 6 Multidistrict Litigation - Transfer   
 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*  
42 USC 1983

Brief description of cause:  
Violation of 1st, 5th, 14th Amendments to US Constitution and other constitutional rights violations

**VII. REQUESTED IN COMPLAINT:**   
 CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.   
**DEMAND \$** \_\_\_\_\_   
 CHECK YES only if demanded in complaint:  
**JURY DEMAND:**   
 Yes   
 No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):*

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE 05/03/2020    SIGNATURE OF ATTORNEY OF RECORD /s/ Stephen D. Stamboulieh

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.  
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P. Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction. Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

**New Civil Case or Notice of Removal (Northern Division)**

U.S. District Court

Southern District of Mississippi

**Notice of Electronic Filing**

The following transaction was entered by Stamboulieh, Stephen on 5/3/2020 at 4:27 PM CDT and filed on 5/3/2020

Case Name: Plaintiff v. Defendant

Case Number: [3:20-mc-09999-UNA](#)

Filer:

Document Number: [140](#)

**Docket Text:**

**NEW NORTHERN DIVISION CIVIL CASE SUBMITTED WITH FEE PAID Land v. Reeves. by Michael Dobbs Land against Governor Tate Reeves Jury Demand, Filing fee \$ 400, receipt number 0538-4265875 The case number above is NOT your case number.**

**After your case has been processed by the Clerk's Office, you will receive a series of NEF's that your Complaint or Notice of Removal has been filed, and notifying you of your case number. DO NOT USE THE CASE NUMBER ABOVE.**  
**Please Print this confirmation page for your records.**

-----

**(Attachments: # (1) Exhibit Letter from Mayor Hawkins-Butler, # (2) Civil Cover Sheet, # (3) Summons Summons on Governor, # (4) Summons Summons on Mayor) (Stamboulieh, Stephen)**

No public notice (electronic or otherwise) sent because the entry is private

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp\_ID=1081288797 [Date=5/3/2020] [FileNumber=5592719-0] [a986758e750541fc9fb0a79c41c3d0756b1e1e1bc142a357158c726c65464b6ebd69223904dd321013dc143b0a3bd0fb806c1dbacc4191aad82e4e7059fb8408]]

Document description:Exhibit Letter from Mayor Hawkins-Butler

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp\_ID=1081288797 [Date=5/3/2020] [FileNumber=5592719-1] [3d7f4fa137566635b787edeaac3dac31ae2a28f2b93b4f5775d3e06ce99ca98c77b29c42cc0ad025331424034d8fb4fe8f167898daf863bb243027a33e6a9539]]

Document description:Civil Cover Sheet

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp\_ID=1081288797 [Date=5/3/2020] [FileNumber=5592719-2] [739016adfd09fa7c035ca3f98a90e6f5b1ddf844cf7bf36a1ff524b387dae892e06a9575931686be1e79cf21e1b45686891cc2eb673d2e190854426fb93f4536]]

**Document description:Summons Summons on Governor**

**Original filename:n/a**

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1081288797 [Date=5/3/2020] [FileNumber=5592719-3]

[6e0d41bbc5612bff8d7b89304c51769655ccc9ba56bde7d6c6c32fac12899c4a770d

8542e4632914ae17900804359aff8d9c75c8fb92c029354b3ae5e4c5f50a]]

**Document description:Summons Summons on Mayor**

**Original filename:n/a**

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1081288797 [Date=5/3/2020] [FileNumber=5592719-4]

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b8e31951e76abee1fcdf85a56d547382472b9af825cc37f46f7cd68f2836]]