



TIMOTHY SUPPLE, JEREMIAH
SUPPLE, KEITH KISHBAUGH,
CAROL ROSS, MARK TOLSON, and
ROSS LITTLE

VERSUS

THE CITY OF LAFAYETTE

DIV. "D"

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15TH JUDICIAL DISTRICT COURT

New Suit

DOCKET NO.: C 20197949.D

LAFAYETTE PARISH, LOUISIANA

SUIT FOR DECLARTORY JUDGMENT

NOW INTO COURT, through undersigned counsel, comes **TIMOTHY SUPPLE, JEREMIAH SUPPLE, KEITH KISHBAUGH, CAROL ROSS, MARK TOLSON and ROSS LITTLE**, persons of the full age of majority, duly qualified to bring this lawsuit, and do further aver as follows:

1.

Made defendant herein is **THE CITY OF LAFAYETTE**, presently represented by its Mayor, Joel Robideaux, the said City of Lafayette being a political subdivision of the State of Louisiana.

2.

There has been passed by the City/Parish Council, for The City of Lafayette, an ordinance number O-225-2019 in it creating the Lafayette Center Development District d/b/a Downtown Development Authority, a copy of which ordinance is attached hereto and made a part hereof.

3.

There are certain requirements for creating such an ordinance, some of them being within the Charter for the City/Parish of Lafayette, others being within the State statutes which enable the charters to be created and set out details for the creation of these charters.

4.

Part of the requirements for creating such a development district as has been created here by The City of Lafayette is the fact that at least 30 days before the enactment of an ordinance, here the enactment being on December 17, 2019, the governing authority is required to conduct a hearing on the passage of the ordinance, and is mandated that a public hearing be conducted 30 days or more prior to the adoption of the ordinance which, in this case, took place on December 17, 2019. Further, the initial introductory meeting calls for a 10 day advance notice to the public, and it was not timely given here.

2019 DEC 27 PM 4:41
CLERK OF COURT
LAFAYETTE, LOUISIANA

INDEX

As a result of this and other violations of the mandated statute, the ordinance referred to herein and attached hereto is null and void, and should be declared as such as it does not comply with the State law to create such.

WHEREFORE, premises considered, **TIMOTHY SUPPLE, JEREMIAH SUPPLE, KEITH KISHBAUGH, CAROL ROSS, MARK TOLSON and ROSS LITTLE** pray that the Court declare that the referenced statute is null and void in its present form, not having met the requirements of appropriate legal creation under the statutes of the State of Louisiana as well as other statutes and law.

AND FOR ALL GENERAL AND EQUITABLE RELIEF, etc.

Respectfully submitted,

BROWN SIMS

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PLEASE SERVE:

The City of Lafayette
Through its Mayor Joel Robideaux
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Lafayette, LA 70503

FILED THIS 27
DAY OF DEC, 20 19
Monet McCord
Deputy Clerk of Court