



TIMOTHY SUPPLE, ET AL
VERSUS
THE CITY OF LAFAYETTE

15TH JUDICIAL DISTRICT COURT
PARISH OF LAFAYETTE
STATE OF LOUISIANA
NO. C-2019-7949-D

.....
PETITION FOR INTERVENTION

The petition for intervention of the Lafayette Centre Development District d/b/a Downtown Development Authority (hereinafter referred to as “DDA”), a political subdivision of the State Louisiana, located within the City of Lafayette, Louisiana, respectfully asserts:

1.

The Lafayette Centre Development District d/b/a Downtown Development Authority (DDA) was created by statutory enactment of the Louisiana Legislature, and functions through its board, as a political subdivision of the State of Louisiana.

2.

Ordinance No. O-225-2019 of the Lafayette City-Parish Council created an economic development district to be known as the “Downtown Lafayette Economic District.”

3.

The foregoing ordinance authorized the City of Lafayette, the Downtown Lafayette Economic District, and the DDA to enter into a cooperative agreement to undertake joint efforts at development, infrastructure improvements, and other goals listed therein.

4.

The DDA, the City of Lafayette, and the Downtown Lafayette Economic District have entered into a contractual cooperative agreement to provide for a taxing district and for the beneficial utilization of these tax-generated funds for the improvement of the geographical areas comprising the DDA and the Downtown Lafayette Economic District. That contractual agreement is titled “Cooperative Endeavor Agreement” and was entered into by and between the parties on January 3, 2020, as is evidenced by the signatures of Joel Robideaux, Mayor-President; by Patrick Lewis, Chairperson of the Downtown Lafayette Economic Development District; and by Anita Begnaud, Chief Executive Officer of the DDA.

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5.

The petition of Timothy Supple, et al. seeks to invalidate the ordinances of the Lafayette City-Parish Council authorizing and creating the aforementioned economic development district.

6.

Such an invalidation of the ordinances referenced will result in the loss of anticipated economic benefit to the downtown of the City of Lafayette, the geographical area encompassing the political subdivision of the DDA. The DDA is statutorily charged with the duty of promoting economic and cultural growth within its boundaries.

7.

The DDA has an interest in the outcome of this litigation as an adverse ruling will negatively impact the economic future of the downtown Lafayette area, all within the geographical boundaries of the DDA. The object of the petition of Timothy Supple, et al. is to invalidate the ordinances referenced, and thereafter, to invalidate the authorized taxing authority of the newly-created economic district.

8.

Based upon information and belief, The City of Lafayette is expected to answer the petition and defend the validity of all ordinances enacted by the Lafayette City-Parish Council and enacted by the Lafayette City Council. The DDA is in accord with that anticipated position of the City of Lafayette. Thus, the DDA opposes the petition of Supple, et al. and anticipates aligning with the defendant, the City of Lafayette, in asserting the validity of the enacted ordinances, and is, therefore, properly positioned pursuant to Louisiana Code of Civil Procedure Article 1091, to intervene in this litigation.

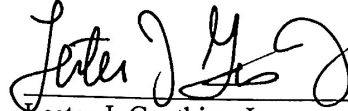
9.

This Petition for Intervention is an incidental demand and may be filed without leave of court at any time before the filing of an answer to the principal demand. (Louisiana Code of Civil Procedure Article 1033.) As of the time of this filing, no answer has been filed by the City of Lafayette.

WHEREFORE, Lafayette Centre Development District d/b/a Downtown Development Authority, prays that this Petition for Intervention be filed herein and that service of process be made individually on each plaintiff, through their counsel of record, and that, after due

proceedings be had, the Petition of Timothy Supple, et al. be dismissed at their costs, and that the court provide all general and equitable relief to which intervenor may be entitled.

Submitted:



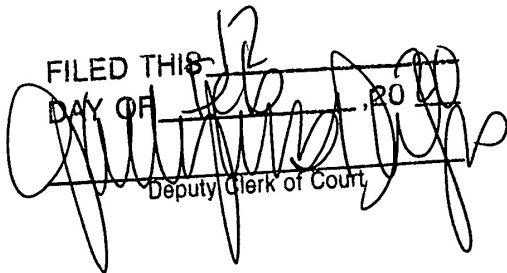
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PLEASE SERVE EACH DEFENDANT SEPARATELY THROUGH COUNSEL OF RECORD:

Timothy Supple
Jeremiah Supple
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Carol Ross
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FILED THIS 12
DAY OF Feb, 2010

Deputy Clerk of Court