

**40th JUDICIAL DISTRICT COURT
PARISH OF ST. JOHN THE BAPTIST
STATE OF LOUISIANA**

NO. 77305

DIVISION “C”

**THE DESCENDANTS PROJECT,
JOCYNTIA BANNER, and JOYCEIA BANNER**

VERSUS

**ST. JOHN THE BAPTIST PARISH,
through its Chief Executive Officer,
Parish President Jaclyn Hotard, et al.**

FILED: _____

DEPUTY CLERK

NOTICE OF INTENTION TO APPLY FOR SUPERVISORY WRIT

NOW INTO COURT, through undersigned counsel, comes Intervenor, Greenfield Louisiana, LLC (“Greenfield”), pursuant to Rule 4-2 of the Uniform Rules, Courts of Appeal, to advise the Court and opposing counsel that Greenfield intends to apply to the Fifth Circuit Court of Appeal for Supervisory Writ concerning this Honorable Court’s May 10, 2022 Judgment denying Greenfield’s Exceptions of No Cause of Action and Prescription. Notice of signing of the Judgment was mailed to all counsel of record by the Clerk of Court on May 13, 2022. Thus, pursuant to Rule 4-3 of the Uniform Rules, Courts of Appeal, Greenfield requests that the Court set June 10, 2022, as the return date by which the application shall be filed in the Fifth Circuit Court of Appeal.

Additionally, pursuant to Rule 4-4 of the Uniform Rules, Courts of Appeal, Greenfield requests the Court to stay all further proceedings in this matter until such time as the Fifth Circuit Court of Appeal acts upon this application. A stay is particularly appropriate here because a reversal of the trial court’s Judgment would result in a dismissal of Plaintiffs’ claims and thus a termination of the matter as a whole.

WHEREFORE, Greenfield respectfully prays that this Court acknowledge receipt of this Notice of Intention to Apply for Supervisory Writ and that the Court set a return date of June 10, 2022 for the filing of its writ application. Additionally, Greenfield prays that the Court stay all further proceedings in this matter until Greenfield’s writ application is acted upon by the Fifth Circuit Court of Appeal.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing has this day been served upon all known counsel of record by electronic mail.

New Orleans, Louisiana, on this 31st day of May, 2022.


