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VERSUS

FIRST JUDICIAL DISTRICT COURT

GEORGE ERIC HATFIELD CADDO PARISH, LOUISIANA AMY LEIGH SENN ROUTE TO MINUTE CLERK LORI MINNIEAR EBERHARTER JENNIFER PAIGE BRADLEY TREADWELL **BOB BROWN**

PERMANENT ASSIGNMENT:

JUDGE

PETITION FOR DAMAGES AND INJUNCTIVE RELIEF

NOW INTO COURT comes MARION K. MARKS, through undersigned counsel, who respectfully represents:

1.

Plaintiff MARION K. MARKS is a person of the full age of majority, domiciled in Caddo Parish, Louisiana, residing on Linden Street, Shreveport, Louisiana.

2.

Made Defendant herein is GEORGE ERIC HATFIELD, a person of full age of majority, domiciled in Caddo Parish, Louisiana, residing at 10040 Loveland Court, Shreveport, Louisiana 71106-8538.

3.

Made Defendant herein is AMY L. SENN, a person of full age of majority, domiciled in Caddo Parish, Louisiana, residing at 10040 Loveland Court, Shreveport, Louisiana 71106-8538.

4.

Made Defendant herein is JENNIFER PAIGE BRADLEY TREADWELL, a person of full age of majority, domiciled in Bossier Parish, Louisiana, residing at 2407 North Waverly Drive, Bossier City, Louisiana 71111. PGS

5.

Made Defendant herein is BOB BROWN, a person of full age of majority, domiciled in Bossier Parish, Louisiana, residing at Bossier City, Louisiana 71111.

6.

Made Defendant herein is LORI MINNIEAR EBERHARTER, a person of

4353 full age of majority, domiciled in Boise, Idaho, who may be served through her TLED

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employer, Plantation Place Assisted Living/Edgewood, 3921 North Kessinger Lane, Boise, Idaho 83703-3003.

7.

From September 17, 2015 through October 5, 2015 (and as may be shown more fully at trial), Defendants HATFIELD and SENN published or caused to be published, false, defamatory, injurious, inflammatory and baseless allegations against MARION K. MARKS, ostensibly arising from an incident of September 17, 2015, in which MARION K. MARKS photographed and videotaped property believed to belong to GEORGE ERIC HATFIELD, duly qualified candidate for Sheriff of Caddo Parish, with permission from other private property or from public ways. Various Defendants cast aspersions upon and commented upon the guilt of Plaintiff, without evidence, based on ridiculous allegations and appearances. Plaintiff suggests even if there were legitimate "spousal" or parental concern initially, given reasonable investigation and certain information provided, including full disclosure of evidence, should have dispelled those concerns. Instead Defendants promulgated and instigated a campaign of personal destruction against Plaintiff for personal, political, economic or social gain.

8.

MARION K. MARKS was at no time before, during or since on the private property of GEORGE ERIC HATFIELD, located on Hatfield-Gorman Road or Watts Road, in Caddo Parish, Louisiana, or elsewhere. Neither did MARION K. MARKS observe, photograph or stake out any persons. MARION K. MARKS was obtaining images of possible environmental hazards, from adjacent property with permission of the owners or tenants. The focus of the photographic endeavor was exclusive to barrels, tanks and other industrial equipment on the Hatfield property, prior to reporting concerns that had been shared with MARION K. MARKS. No persons were captured, harmed or involved in the filming or photography. MARION K. MARKS did not photograph AMY SENN or TRACKER HATFIELD, or any other women or children.

Defendants GEORGE ERIC HATFIELD and AMY LEIGH SENN posted a series of accusations on Facebook or other social media, alleging, *inter alia*, that MARION K. MARKS was committing the criminal offense of Stalking, as defined in La. R.S. 14:40.2, which provides as follows:

§40.2. Stalking

- A. Stalking is the intentional and repeated following or harassing of another person that would cause a reasonable person to feel alarmed or to suffer emotional distress. Stalking shall include but not be limited to the intentional and repeated uninvited presence of the perpetrator at another person's home, workplace, school, or any place which would cause a reasonable person to be alarmed, or to suffer emotional distress as a result of verbal, written, or behaviorally implied threats of death, bodily injury, sexual assault, kidnapping, or any other statutory criminal act to himself or any member of his family or any person with whom he is acquainted.
- B.(1)(a) Notwithstanding any law to the contrary, on first conviction, whoever commits the crime of stalking shall be fined not less than five hundred dollars nor more than one thousand dollars and shall be imprisoned for not less than thirty days nor more than one year. Notwithstanding any other sentencing provisions, any person convicted of stalking shall undergo a psychiatric evaluation. Imposition of the sentence shall not be suspended unless the offender is placed on probation and participates in a court-approved counseling which could include but shall not be limited to anger management, abusive behavior intervention groups, or any other type of counseling deemed appropriate by the courts.
- (b) Whoever commits the crime of stalking against a victim under the age of eighteen when the provisions of Paragraph (6) of this Subsection are not applicable shall be imprisoned for not more than three years, with or without hard labor, and fined not more than two thousand dollars, or both.
- (2)(a) Any person who commits the offense of stalking and who is found by the trier of fact, whether the jury at a jury trial, the judge in a bench trial, or the judge at a sentencing hearing following a jury trial, beyond a reasonable doubt to have placed the victim of the stalking in fear of death or bodily injury by the actual use of or the defendant's having in his possession during the instances which make up the crime of stalking a dangerous weapon or is found beyond a reasonable doubt to have placed the victim in reasonable fear of death or bodily injury, shall be imprisoned for not less than one year nor more than five years, with or without hard labor, without benefit of probation, parole, or suspension of sentence and may be fined one thousand dollars, or both. Whether or not the defendant's use of or his possession of the dangerous weapon is a crime or, if a crime, whether or not he is charged for that offense separately or in addition to the crime of stalking shall have no bearing or relevance as to the enhanced sentence under the provisions of this Paragraph.
- (b) If the victim is under the age of eighteen, and when the provisions of Paragraph (6) of this Subsection are not applicable, the offender shall be imprisoned for not less than two years nor more than five years, with or without hard labor, without benefit of probation, parole, or suspension of sentence and may be fined not less than one thousand nor more than two thousand dollars, or both.
- (3) Any person who commits the offense of stalking against a person for whose benefit a protective order, a temporary restraining order, or any lawful order prohibiting contact with the victim issued by a judge or magistrate is in effect in either a civil or criminal proceeding, protecting the victim of the stalking from acts by the offender which otherwise constitute the crime of stalking, shall be punished by imprisonment with or without hard labor for not less than ninety days and not more than two years or fined not more than five thousand dollars, or both.

- (4) Upon a second conviction occurring within seven years of a prior conviction for stalking, the offender shall be imprisoned with or without hard labor for not less than five years nor more than twenty years, without benefit of probation, parole, or suspension of sentence, and may be fined not more than five thousand dollars, or both.
- (5) Upon a third or subsequent conviction, the offender shall be imprisoned with or without hard labor for not less that ten years and not more than forty years and may be fined not more than five thousand dollars, or both.
- (6)(a) Any person thirteen years of age or older who commits the crime of stalking against a child twelve years of age or younger and who is found by the trier of fact, whether the jury at a jury trial, the judge in a bench trial, or the judge at a sentencing hearing following a jury trial, beyond a reasonable doubt to have placed the child in reasonable fear of death or bodily injury, or in reasonable fear of the death or bodily injury of a family member of the child shall be punished by imprisonment with or without hard labor for not less than one year and not more than three years and fined not less than fifteen hundred dollars and not more than five thousand dollars, or both.
 - (b) Lack of knowledge of the child's age shall not be a defense.
- C. For the purposes of this Section, the following words shall have the following meanings:
- (1) "Harassing" means the repeated pattern of verbal communications or nonverbal behavior without invitation which includes but is not limited to making telephone calls, transmitting electronic mail, sending messages via a third party, or sending letters or pictures.
- (2) "Pattern of conduct" means a series of acts over a period of time, however short, evidencing an intent to inflict a continuity of emotional distress upon the person. Constitutionally protected activity is not included within the meaning of pattern of conduct.
 - (3) Repealed by Acts 1993, No. 125, §2.
- D. As used in this Section, when the victim of the stalking is a child twelve years old or younger:
- (1) "Pattern of conduct" includes repeated acts of nonconsensual contact involving the victim or a family member.
 - (2) "Family member" includes:
- (a) A child, parent, grandparent, sibling, uncle, aunt, nephew, or niece of the victim, whether related by blood, marriage, or adoption.
 - (b) A person who lives in the same household as the victim.
- (3)(a) "Nonconsensual contact" means any contact with a child twelve years old or younger that is initiated or continued without that child's consent, that is beyond the scope of the consent provided by that child, or that is in disregard of that child's expressed desire that the contact be avoided or discontinued.
 - (b) "Nonconsensual contact" includes:
 - (i) Following or appearing within the sight of that child.
- (ii) Approaching or commonting that child in a public place or on private property.
 - (iii) Appearing at the residence of that child.
 - (iv) Entering onto or remaining on property occupied by that child.
 - (v) Contacting that child by telephone.
 - (vi) Sending mail or electronic communications to that child.
- (vii) Placing an object on, or delivering an object to, property occupied by that child.
- (c) "Nonconsensual contact" does not include any otherwise lawful act by a parent, tutor, caretaker, mandatory reporter, or other person having legal custody of the child as those terms are defined in the Louisiana Children's Code.
 - (4) "Victim" means the child who is the target of the stalking.
- J. A conviction for stalking shall not be subject to expungement as provided for by R.S. 44:9.

Acts 1992, No. 80, §1; Acts 1993, No. 125, §§1, 2; Acts 1994, 3rd Ex. Sess., No. 30, §1; Acts 1995, No. 416, §1; Acts 1995, No. 645, §1; Acts 1997, No. 1231, §1, eff. July 15, 1997; Acts 1999, No. 957, §1; Acts 1999, No. 963, §1; Acts 2001, No. 1141, §1; Acts 2003, No. 1089, §1; Acts 2005, No. 161, §1; Acts

· 2007, No. 62, §1; Acts 2007, No. 226, §1; Acts 2012, No. 197, §1; Acts 2015, No. 440, §1.

The allegation of stalking is a serious and unsubstantiated claim intended to injure MARION K. MARKS.

10.

In addition to the serious and baseless allegations of Stalking, *supra*, Defendants GEORGE ERIC HATFIELD and AMY LEIGH SENN, falsely characterized MARION K. MARKS as a "possible child predator" or "possibly a sexual predator intending to do harm to my family but we have not confirmed that."

11.

Upon information and belief, Defendants GEORGE ERIC HATFIELD and AMY LEIGH SENN reported these allegations to authorities around noontime on September 17, 2015, at which time they knew or should have known the identity of MARION K. MARKS, who is well-known as a government watchdog, political blogger and forensic specialist.

12.

The initial post by GEORGE ERIC HATFIELD at 1:19pm on September 17 alleged that the individual "stalked Amy" for 15 minutes and made an allegation about property damage to a Hatfield automobile.

13.

The second post by GEORGE ERIC HATFIELD at 10:20pm on September 17, 2015 purported to be a legitimate request by GEORGE ERIC HATFIELD, duly elected Constable for Ward 8, Caddo Parish, to identify the "suspect", although MARION K. MARKS was previously known to both GEORGE ERIC HATFIELD and AMY LEIGH SENN, at least since May 5, 2015, through Facebook exchanges and a public forum in which MARION K. MARKS asked GEORGE ERIC HATFIELD a question while videotaping the forum.

14.

In addition, Defendants have accused Plaintiff of similar conduct in Vivian on an unnamed date, and on unspecified property of September 23, 2015. On September 26, 2015, SENN re-posted a screen shot from her earlier posts, after

· getting mad over a blog post or email. Defendants have exhibited an attitude of impunity, vindictiveness and retribution, which belies their stated concerns.

15.

As Ward 4 Constable, GEORGE ERIC HATFIELD acted under color of law, in the same manner in which he, in his official capacity, had previously posted surveillance photographs of burglary suspects in at least two separate incidents.

16.

On the September 17, 2015 incident at bar, GEORGE ERIC HATFIELD assembled and misrepresented photographs from the inside of Fireplace Specialties, as MARION K. MARKS sought permission of Eric Massey or others to photograph from the rear of the business, along with still photographs of MARION K. MARKS with a ladder and tripod and of MARION K. MARKS' personal vehicle. This post at 10:20pm September 17, 2015 was well after the incident and the identification of MARION K. MARKS, known to Defendants GEORGE ERIC HATFIELD and AMY LEIGH SENN.

17.

The actions were part of a deliberate and ongoing scheme to generate campaign interest with the intention to propel GEORGE ERIC HATFIELD into higher elective office, resulting in economic gain to him and to AMY LEIGH SENN, with whom he has lived in open concubinage for several years and with whom he fathered their child "Tracker", who is featured along with other members of the family of GEORGE ERIC HATFIELD and AMY LEIGH SENN, on campaign and personal Facebook pages which cross-post with great regularity. HATFIELD and SENN allege great concerns for his safety, inconsistent with their behavior.

18.

Although he has had contact with Plaintiff since May 5, 2015, GEORGE ERIC HATFIELD has displayed this *modus operandi* at least as far back as August, 2015 and recently, quite frequently, as a political martyr challenging an

incumbent Sheriff, characterized as a "tyrannical regime", against a well-known newspaper publisher and against unknown suspects in campaign sign vandalism. GEORGE ERIC HATFIELD has intentionally alleged that MARION K. MARKS is involved with other acts besides the one at issue.

19.

In addition to making the initial posts purporting to seek identification of MARION K. MARKS, GEORGE ERIC HATFIELD and AMY LEIGH SENN, have permitted the offending posts to remain, despite amicable demand to remove them, and despite promises by GEORGE ERIC HATFIELD on September 29, 2015 to remove them.

20.

In addition to the original posts, there are over 300 "Shares" and more numerous "Likes", wherein the expansive reach of these allegations were published to a wider audience, including peers, clients and friends of MARION K. MARKS. Defendants intentionally promote the candidacy of GEORGE ERIC HATFIELD as an honest man of integrity to replace the incumbent, in a "unifying" campaign that has featured race-baiting, divisiveness and emotional appeals to rally voters; which has strategically resulting in only slightly-veiled threats of great bodily harm, death and disappearance of Plaintiff. One such post publicized consumption by alligators and another utilizing a wood chipper. Defendant HATFIELD monitored and intermingled his posts among these examples. As an elected peace officer seeking to become the Sheriff of Caddo Parish, he cannot claim ignorance of the import of these posts. At the very least, he is negligent in allowing them to remain, despite agreeing to do so. HATFIELD is complicit in terrorizing MARION K. MARKS.

21.

Defendant JENNIFER PAIGE BRADLEY TREADWELL published these allegations, which she knew or should have known were without proof, adding her own characterizations consistent with the original posts and hurling additional epithets through her keyboard to an even wider audience.

Defendant LORI MINNIEAR EBERHARTER, mother of AMY LEIGH SENN, who has known MARION K. MARKS professionally for several years, published these allegations, which she knew or should have known were without proof, adding her own characterizations consistent with the original posts and hurling additional epithets through her keyboard to an even wider audience, specifically calling for "help" to make the concerns of her daughter "stop". EBERHARTER has shared a post entitled "STALKER UPDATE" by HATFIELD.

23.

Defendant BOB BROWN, who has known MARION K. MARKS professionally for several years, published these allegations, which he knew or should have known were without proof, adding his own characterizations consistent with the original posts and hurling additional epithets through his keyboard to an even wider audience, including but not limited to friends, professional colleagues and prior clients of MARION K. MARKS. BOB BROWN regularly attends a media luncheon with MARION K. MARKS, and made allegations purporting to corroborate the characterizations by GEORGE ERIC HATFIELD, which were repeated by GEORGE ERIC HATFIELD in subsequent posts. For example, MARION K. MARKS enjoys a favorable reputation as a technology tester and forensic data specialist among law enforcement, testing body cameras and producing Crimestopper videos which he hosts and distributes. HATFIELD and BROWN have suggested the retention or presence of counsel constitute guilt, in their Trial by Facebook and whisper campaign. TREADWELL has also participated in an intentional smear campaign on Facebook, along with Tammy Duke and Amanda Gates Smith.

24

Defendant BOB BROWN is employed as a Communications Director for the local Central Trades Union Council, who regularly participates as an election operative, for the organization which endorses candidates, generally those of the Democrat Party. BOB BROWN is very familiar with MARION K. MARKS with his forensic work regarding a Mardi Gras Bal, in which "someone" allegedly drugged mayoral candidate Victoria Provenza. BOB BROWN specifically transmitted the "Shared" post to Miss Provenza, with whom, upon information and belief, he has a lengthy private messaging history consistent with his *modus operandi* herein.

25.

As a foreseeable result of these injurious actions, friends and supporters of GEORGE ERIC HATFIELD, AMY LEIGH SENN, and LORI MINNIEAR EBERHARTER have predictably made menacing remarks on Facebook, which have spawned publication of the likeness of MARION K. MARKS and intimated violence upon MARION K. MARKS.

26.

Besides doing nothing to openly discourage this mob behavior, Constable GEORGE ERIC HATFIELD has actively commented on Facebook social media in the midst of the persons of questionable intent coming out from the recesses of Facebook to offer nefarious aid.

27.

The following list is illustrative of the "parent" posts currently posted with their "child" shares:

https://www.facebook.com/photo.php?fbid=10207492256971780&set=a.3067391610984.2152097.1449372371&type=3&theater

https://www.facebook.com/Erichatfield72/posts/10207282521011757
https://www.facebook.com/Erichatfield72/posts/10207285191118508
https://www.facebook.com/Erichatfield72/posts/10207370954662543

28.

In addition, Defendants GEORGE ERIC HATFIELD and AMY LEIGH SENN have caused to be issued Rules to Show Cause in Shreveport City Court, Peace Bond applications bearing docket numbers 2015R08575 and 2015R08587, set days after the election of October 24, 2015 – October 28 and just before the runoff of November 21, 2015 - November 18, 2015. These matters lack the legal requisites to maintain on their face, and should be consolidated with the relief requested by MARION K. MARKS.

MARION K. MARKS suggests that these filings are more political theatre by the candidate GEORGE ERIC HATFIELD and his girlfriend AMY LEIGH SENN, intended to serve no lawful purpose and contrary to the urgency expressed in the myriad Facebook posts and in the accompanying affidavits in support thereof.

30.

These actions are designed, intended and executed to cause damage to MARION K. MARKS, in the following non-exclusive ways:

- Limit inquiry, investigation and comment on political and social matters
 of personal and private import, including violating the free speech
 rights of MARION K. MARKS;
- Interfere with the legitimate business and professional interests of MARION K. MARKS, including but not limited to damaging his credibility as a witness in court proceedings currently at bar;
- c. Intentionally inflict emotional distress and mental anguish upon MARION K. MARKS and his family;
- d. Defame, libel or slander MARION K. MARKS;
- e. Invade the privacy of MARION K. MARKS:
- f. Threaten to expose MARION K. MARKS to criminal prosecution or public ridicule for pecuniary gain;
- g. Damage the present and future employment prospects of MARION K.
 MARKS;
- h. Intentionally interfere with contracts of MARION K. MARKS;
- i. Abuse legal process, and
- j. Any further acts or omissions causing damage as may be shown more fully at trial.

31.

MARION K. MARKS has incurred the general, special and punitive damages as set forth above, including but not limited to:

Lost economic opportunity;

- b. Mental anguish;
- Damage to reputation and good standing in the community;
- d. Physical damage to his health;
- e. Loss of consortium, service and society;
- f. Any and all damages that may be more fully shown at trial.

32.

All of the above and foregoing damages were solely due to the negligence or intentional acts of the Defendants GEORGE ERIC HATFIELD, who is liable, in solido, with AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL.

33.

In addition to his claim for damages, MARION K. MARKS is suffering from irreparable harm by the acts or omissions of Defendants, and therefore desires and is entitled to a temporary restraining order, and ultimately permanent injunctive relief against Defendants GEORGE ERIC HATFIELD, AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL and in favor of MARION K. MARKS, prohibiting, restraining and ordering the removal of all current and future posts, shares and comments, whether original or derivative, alleging any criminal acts, characterizing and casting MARION K. MARKS in a bad light, or accusing him of any inappropriate or unlawful behavior.

34.

A Rule Nisi should issue, ordering and commanding Defendants GEORGE ERIC HATFIELD, AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL to show cause, if any they have, why the relief set forth above should not issue in the form of permanent injunctive relief, in the form of the temporary restraining order issued herein.

WHEREFORE, MARION K. MARKS prays for judgment in this matter for general, special and punitive damages, including but not limited to:

Lost economic opportunity;

- b. Mental anguish;
- c. Damage to reputation and good standing in the community;
- d. Physical damage to his health;
- e. Loss of consortium, service and society;
- f. Any and all damages that may be more fully shown at trial, and,
- g. for any and all just and equitable relief appropriate in the premises.

FURTHER, MARION K. MARKS prays that a temporary restraining order issue against Defendants GEORGE ERIC HATFIELD, AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL and in favor of MARION K. MARKS, prohibiting, restraining and ordering the removal of all current and future social media posts, shares and comments, whether original or derivative, and prohibiting them from alleging any criminal acts, characterizing and casting MARION K. MARKS in a bad light, or accusing him of any inappropriate or unlawful behavior in any form or manner whatsoever, except as privileged under the law; and that a *Rule Nisi* issue why a permanent injunction in the form and content of the Temporary Restraining Order should not issue.

Respectfully submitted,

Daniel R. Keele, 18975

KEELE LAW OFFICÉS, LLC 1032-36 Texas Avenue (By appt.)

Post Office Box 303

Shreveport, LA 71162-0303 Telephone: 318-564-9990

Fax:

318-222-2731

K9lawyer@bellsouth.net

Please serve:

GEORGE ERIC HATFIELD 10040 Loveland Court Shreveport, LA 70506-8538

AMY LEIGH SENN 10040 Loveland Court Shreveport, LA 70506-8538 LORI MINNIEAR EBERHARTER
Via Long Arm through her employer,
Plantation Place Assisted Living/Edgewood
3921 North Kessinger Lane
Boise, Idaho 83703-3003

JENNIFER PAIGE BRADLEY TREADWELL 2407 North Waverly Drive Bossier City, Louisiana 71111

BOB BROWN Central Trades & Labor Council 3924 Greenwood Road Shreveport, LA 71109 FIRST JUDICIAL DISTRICT COURT
CADDO PARISH, LOUISIANA
WELL
ENT: JUDGE

GEORGE ERIC HATFIELD CAI AMY LEIGH SENN LORI MINNIEAR EBERHARTER JENNIFER PAIGE BRADLEY TREADWELL BOB BROWN

MARION K. MARKS

VERSUS

PERMANENT ASSIGNMENT:

ORDER

CONSIDERING THE FOREGOING, It is ordered that a Temporary Restraining Order issue herein, to Defendants GEORGE ERIC HATFIELD, AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL and in favor of MARION K. MARKS, prohibiting, restraining and ordering the removal of all current and future social media posts, shares and comments, whether original or derivative, and prohibiting them from alleging any criminal acts, characterizing and casting MARION K. MARKS in a bad light, or accusing him of any inappropriate or unlawful behavior in any form or manner whatsoever, except as privileged under the law.

IT IS FURTHER ORDERED that a *Rule Nisi* issue to Defendants GEORGE ERIC HATFIELD, AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL, to show cause, if any they can, on the _____ day of October, 2015, why a permanent injunction in the form and content of the Temporary Restraining Order should not issue.

SHREVEPORT, LOUISIANA, this ____ day of October, 2015.

Judge, First Judicial District

Prepared by:

Daniel R. Keele, 18975 KEELE LAW OFFICES, LLC 1032-36 Texas Avenue (By appt.) Post Office Box 303 Shreveport, LA 71162-0303 Telephone: 318-564-9990

Fax: 318-222-2731 K9lawyer@bellsouth.net

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MARION K. MARKS

NUMBER ____

VERSUS

FIRST JUDICIAL DISTRICT COURT

GEORGE ERIC HATFIELD CADDO PARISH, LOUISIANA
AMY LEIGH SENN
LORI MINNIEAR EBERHARTER
JENNIFER PAIGE BRADLEY TREADWELL
BOB BROWN

PERMANENT ASSIGNMENT:

JUDGE _

ORDER

CONSIDERING THE FOREGOING, It is ordered that a Temporary Restraining Order issue herein, to Defendants GEORGE ERIC HATELELD, AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL and in favor of MARION K. MARKS, prohibiting, restraining and ordering the removal of all current and future social media posts, shares and comments, whether original or derivative, and prohibiting them from alleging any criminal acts, characterizing and casting MARION K. MARKS in a bad light, or accusing him of any inappropriate or unlawful behavior in any form or manner whatsoever, except as privileged under the law.

IT IS FURTHER ORDERED that a *Rule Nisi* issue to Defendants GEORGE ERIC HATFIELD, AMY LEIGH SENN, LORI MINNIEAR EBERHARTER, BOB BROWN, and JENNIFER PAIGE BRADLEY TREADWELL, to show cause, if any they can, on the 19 day of October, 2015, why a permanent injunction in the form and content of the Temporary Restraining Order should not issue.

SHREVEPORT, LOUISIANA, this

day of October, 2015.

Judge, First Judicial Distric

Prepared by:

Daniel R. Keele, 1897

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