

IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI

LYNELL SCALES, AUDRIANNA SCALES, ADRIENNE SCALES,  
KRISTI BROWN, ADAM HILL, NATASHA WILSON,  
WANDA KELLUM, CAROLYN GREGG, GLENN HAYES,  
WILLIE ROGERS, J.T. ROGERS, GOLDEN LEE, MIRACL HILL,  
TAMMIE REED, KISSY LUCIOUS, LATOYA LEE, TIKIA YOUNG,  
RACHEL CUMMINGS, FRANK BROWN, KADEJIA GRAHAM, and  
STARSHA GARDNER

PLAINTIFFS

VERSUS

CAUSE NO:

FERRETTI PROPERTY SERVICES, LLC

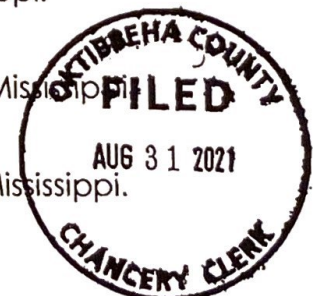
DEFENDANT

COMPLAINT FOR INJUNCTIVE RELIEF, DECLARATORY JUDGMENT  
AND OTHER RELIEF

COMES NOW, the above styled Plaintiffs, by and through their undersigned counsel of record, and files this Complaint against Ferretti Property Services, LLC, and in support thereof would show, as follows:

Parties and Jurisdiction

1. Lynell Scales is an adult resident of Oktibbeha County, Mississippi.
2. Audrianna Scales is an adult resident of Oktibbeha County, Mississippi.
3. Adrienne Scales is an adult resident of Oktibbeha County, Mississippi.
4. Kristi Brown is an adult resident of Oktibbeha County, Mississippi.
5. Adam Hill is an adult resident of Oktibbeha County, Mississippi.
6. Natasha Wilson is an adult resident of Oktibbeha County, Mississippi.
7. Wanda Kellum is an adult resident of Oktibbeha County, Mississippi.



8. Carolyn Gregg is an adult resident of Oktibbeha County, Mississippi.
9. Glenn Hayes is an adult resident of Oktibbeha County, Mississippi.
10. Willie Rogers is an adult resident of Oktibbeha County, Mississippi.
11. J.T. Rogers is an adult resident of Oktibbeha County, Mississippi.
12. Golden Lee is an adult resident of Oktibbeha County, Mississippi.
13. Miracl Hill is an adult resident of Oktibbeha County, Mississippi.
14. Tammie Reed is an adult resident of Oktibbeha County, Mississippi.
15. Kissy Lucious is an adult resident of Oktibbeha County, Mississippi.
16. Latoya Lee is an adult resident of Oktibbeha County, Mississippi.
17. Tikia Young is an adult resident of Oktibbeha County, Mississippi.
18. Rachel Cummings is an adult resident of Oktibbeha County, Mississippi.
19. Frank Brown is an adult resident of Oktibbeha County, Mississippi.
20. Kadejia Graham is an adult resident of Oktibbeha County, Mississippi.
21. Starsha Gardner is an adult resident of Oktibbeha County, Mississippi.
22. Ferretti Property Services, LLC is a company located in Bolivar County, Mississippi that owns real estate interests in Oktibbeha County, Mississippi, namely Catherine Street Apartments; it may be served with process on its

registered agent, David S. Norquist 150 North Sharpe Avenue, Cleveland, Mississippi 38732.

Venue and Jurisdiction

23. This Court has jurisdiction pursuant to Miss. Const. Art. 6 Sec. 159 and Mississippi Code Ann. Sec. 9-5-81, and venue is properly fixed in Oktibbeha County, Mississippi.

Facts (EXHIBITS A, B, & C)

24. Ferretti Property Services, LLC (Ferretti) purchased Catherine Street Apartments from Simmons Properties, LLC in May 2021.

25. Ferretti allowed the Plaintiffs' leases to expire, upon which, each tenancy converted by operation of law to a month-to-month tenancy.

26. Catherine Street Apartments are family and individual residential rental apartments located off of North Montgomery Street in Starkville, Mississippi.

27. The tenants are typically lower income and impoverished citizens of Oktibbeha County, Mississippi with limited means to relocate quickly.

28. Ferretti Property Services, LLC seeks to illegally evict tenants from the 65 housing units at Catherine Street Apartments. No tenants are subject to eviction due to nonpayment of rent.

29. Ferretti did not give 30 days written notice to vacate as required in a month-to-month tenancy.



30. Instead, Ferretti filed suit to evict some Plaintiffs on July 26, 2021 prior to any written notice. Some of the complaints were served after July 31, 2021.

31. Ferretti and a number of the summoned Plaintiffs attended a hearing in the Justice Court of Oktibbeha County, Mississippi on August 18, 2021.

32. Also, on August 18, 2021, Ferretti filed suit for eviction against the remaining Plaintiffs.

33. As before, Ferretti failed to give 30 day written notices to these Plaintiffs prior to instituting suit. Instead, they attempted to provide written notices dated August 18, 2021. (EXHIBIT D)

34. On Friday, August 27, 2021 at approximately 9:00 a.m., agent(s) of Ferretti Property Services, LLC along with members of the Starkville Police Department went door to door informing tenants that they had to immediately remove themselves from the premises.

35. On August 27, no Court order for eviction was signed or in place and based on information and belief, no signed order for eviction is currently in place.

36. Tenants were not given sufficient notice prior to Ferretti Property Services, LLC's attempt to terminate their tenancy.

37. Tenants have been notified by Ferretti Property Services, LLC that they must be out and will be removed from their homes on Tuesday, August 31, 2021.



38. The removal of the tenants on August 31 violates their right to sufficient notice and illegally places the tenants and families in an impossible position to find alternative housing on such short notice.

Count I: Declaratory Relief

39. Plaintiffs incorporate the foregoing allegations as though fully set out herein.

40. Pursuant to Sec. 89-7-35 Miss. Code Ann. removal without eviction warrant is improper.

41. Pursuant to Sec. 89-8-19 Miss. Code Ann. notice for eviction provided to the Plaintiffs was improper.

42. As a result, this court should issue a declaratory judgment holding that Ferretti Property Services, LLC be prohibited from removing or evicting any tenant at Catherine Street Apartments without proper notice.

Count II: Injunctive Relief

43. Plaintiffs incorporate the foregoing allegations as though fully set out herein.

44. Upon information and belief, the removal of the Plaintiffs from Catherine Street Apartments is imminent.

45. Such action would immediately and irreparably harm the residents removed from Catherine Street Apartments.

46. This Court should issue a temporary restraining order without notice to Ferretti Property Services, LLC enjoining it from removing or evicting tenants because such immediate and irreparable injury has been threatened and attempted already and may be carried out at any moment and because Plaintiffs have exhausted all means of otherwise preventing this damage.

47. This Court should further issue a permanent injunction against Ferretti Property Services, LLC except and until bringing it into conformity with the laws of the state of Mississippi, after notice and a final hearing on this matter.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that this Court grant the following relief:

- a) A temporary restraining order enjoining Ferretti Property Services, LLC from removing or evicting tenants because such immediate and irreparable injury has been threatened and attempted already and may be carried out at any moment and because Plaintiffs have exhausted all means of otherwise preventing this damage.
- b) A permanent injunction enjoining Ferretti Property Services, LLC from removing or evicting tenants because such immediate and irreparable injury has been threatened and attempted already and may be carried out at any moment and because Plaintiffs have exhausted all means of otherwise preventing this damage.

- c) A declaratory Judgment holding that Ferretti Property Services, LLC be prohibited from removing or evicting any tenant at Catherine Street Apartments without proper notice.
- d) That Ferretti Property Services, LLC be required to pay to Plaintiffs compensatory damages, costs and reasonable attorney's fees; and
- e) Any other relief, general and specific, this Court deems proper.

Respectfully submitted, this the 31<sup>st</sup> day of August, 2021.

VOLLOR LAW FIRM, P.A.



Austin Vollar  
Attorney for Plaintiffs

MSB#10459  
Vollar Law Firm, P.A.  
127 East Main Street  
Post Office Box 80120  
Starkville, Mississippi 39759  
Phone: (662)323-0083  
Fax: (662)323-7788  
[austin@vollarlawfirm.com](mailto:austin@vollarlawfirm.com)

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## 'Don't Know Where We're Going Next': Mass Evictions Underway In Starkville

BY NICK JUDIN      AUGUST 28, 2021



*T. Young, a Starkville mother of four, is one of dozens of residents facing a mass eviction, in the middle of a pandemic, as the Catherine Street Apartments's new owners plan to rehabilitate a crumbling rental complex. Photo courtesy Brandi Duncan-Herrington*

T. Young's reprieve from homelessness was three days.

The mother of four rushed home Friday when she heard the news. When she arrived, officers were still traveling door to door at Catherine Street Apartments in Starkville, flanking a representative from her new rental company. They were informing the residents that the mass-eviction process that started only weeks before was resolving, and resolving quickly.

EXHIBIT

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What happened next is disputed. Were residents given three hours, or three days? Young is adamant that she heard three hours. "They said, 'you have three hours to get out,'" she told the Mississippi Free Press in an Aug. 28 interview. "I was on the phone with my boyfriend, and I heard her say it. She was close enough for me to hear her. (Then) she said to get all our stuff packed up and leave."

Others at the apartment complex heard the same message. Before long, activists arrived, representatives from Starkville Strong, from the Oktibbeha County NAACP. Twenty minutes after Young made it home, Starkville Mayor Lynn Spruill arrived. The eviction moratorium had not even been dead a full day. It may not have helped, though; the Starkville evictions have nothing to do with rent money.

Spruill conferred with Judge Marty Haug, who confirmed that he had not yet signed a removal order. But the order is coming, as sure as the hurricane brewing in the south. Monday morning, his signature will adorn it. On Tuesday, Young, her boyfriend and their four children—11, 9, 7, and a month old—will lose their home. Accompanying them will be many of the dozens and dozens of families living across 61 units at Catherine Street Apartments.

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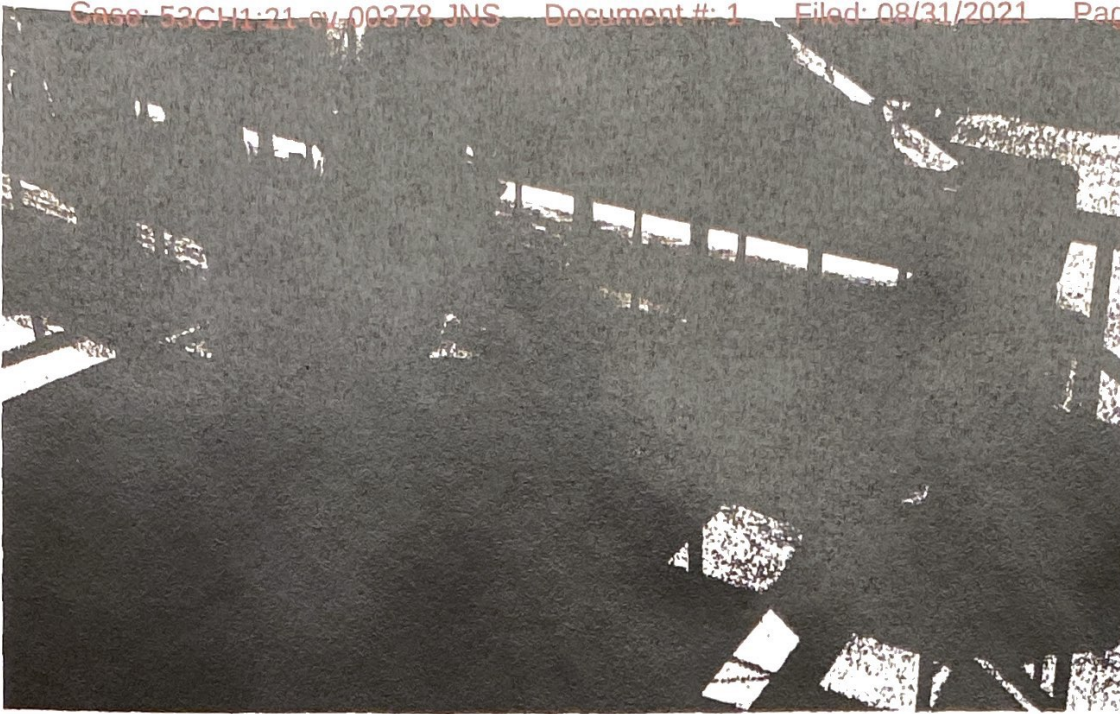
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No back rent can save them. The apartments' new owners plan to rehabilitate the buildings. For this, they want all of the residents gone. Without an active lease, nothing in Mississippi State Code prevents the evictions.

"At this point, we don't know where we're going next," Young said. Her family had experienced homelessness already, finding a place at Catherine Street Apartments in December 2020 with the assistance of Starkville Strong, a local civic support group. That same organization is working to help Young and her partner now. Exhaustion fills her voice, and sorrow quiets it.

A hotel stay, they hope, will get them through the first weeks of September. Then, God willing, another affordable housing unit, one that might provide shelter for more than a year before unceremoniously throwing them out.





*Residents load their belongings on trucks, attempting to vacate the Catherine Street Apartments before Tuesday. Photo courtesy Brandi Duncan-Herrington*

Two weeks before Young's near-eviction, Gov. Tate Reeves signed an extension of Mississippi's state of emergency, with the delta variant brutalizing the state beyond any previous peak. Today, he declared a separate state of emergency due to the hurricane bearing down on the state. Young faces a more personal calamity. But she does not face it alone.

Emergency, emergency. Even the word, repeated enough times, loses its meaning. Coronavirus rages everywhere in Mississippi, filling hospitals until they spill out into field tents. More than 1,000 aid workers flood the state, staunching the bleeding of a wounded health-care system. Hurricane Ida looms in the Gulf of Mexico, poised to batter the coast and submerge the region in storms and floods and more medical crises.

The day of the eviction notice, Young held her baby in her arms, watching as her neighbors carted their furniture out of Catherine Street Apartments by the truckload. Some sat in the heat, sweating in the sun, masks hanging around their necks. Others locked their doors and waited, hoping for an intercession, still struggling to understand the ephemeral, inconsistent moratoriums. Was it legal to throw them out in all this? Hadn't they paid their rent? Young had.

All around her, Mississippi unravels.

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Residents, activists and local leadership alike agree that the owners of Catherine Street Apartments have been failing their tenants for close to two decades now.

Brandi Duncan-Herrington, of Starkville Strong, explained to the Mississippi Free Press in an Aug. 28 interview that the condition of the apartments is atrocious. "These units, there's leaks (all over)—a lot of 'em don't even have air conditioning," she said.

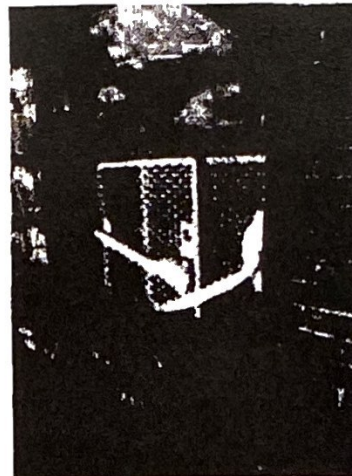
The Starkville Daily News' Editor Jessica Lindsey encountered even worse in conversations with residents—knee-high water in some units. Residents reported maggot infestations, lack of refrigerators and other basic necessities, horrific living conditions dating back to the turn of the millennium. Starkville Daily News' Reporter Cal Brown first reported the sudden evictions, visiting the apartment complex Friday in a state of chaos as residents scrambled to find accommodations and assistance removing their furniture.

Young, who asked not to be identified by her full name, has been without hot water for most of her time at Catherine Street Apartments. "We have to boil some water and put it in the tub so we can take a bath," she said today. It took extensive negotiation just to get a working fridge in her apartment.

Starkville Ward 5 Alderman Hamp Beatty did not mince words in an afternoon interview with the Mississippi Free Press today. "It's substandard housing. The living conditions have to be some of the worst in the city. The people here deserve to live better. There are buyers out there that purchase this type of property, let the cashflow come in and put no money into development. And that's what's happened to this property over 18 to 20 years," he said.

Ownership of the apartment complex repeatedly changed hands. Simmons Properties, LLC, owned it last, though residents were more familiar with Maroon and White Realty, who managed the complex. This year, Ferretti Property Services, LLC, purchased the apartment complex. In early August, when many residents had yet to meet with anyone from Ferretti, dozens were summoned to appear in court for an eviction hearing.

At the Aug. 18 court date, residents heard no demands for back payment. Their leases had simply expired. No rent payments could satisfy the company. Tenants reported rent hikes after Ferretti Property Services took ownership of the apartment complex—rent going from \$450 to \$550—but back rent was not on the table for the evicted residents.



*Residents, activists, and local leadership called the conditions at the apartment complex deplorable, often lacking in basic services like air conditioning or fridges. Photo courtesy Brandi Duncan-Herrington*

It was Aug. 25 when residents at Catherine Street Apartments found notices on their door that the hammer was dropping. "The reason for your eviction is that Ferretti Property Services is simply NOT renewing your lease agreement," the notice read. "As the Landlord and by the Laws of the State of Mississippi we are allowed to not renew any lease as we so desire."

Starkville Mayor Lynn Spruill told the Mississippi Free Press that there was nothing she could do to prevent the evictions. "These folks who own the apartments have gone through the proper legal process, and the judge has rendered the eviction notice," Spruill said today. "They have been through the court system and, as far as I can tell, (the residents) have had proper notice."

Ferretti Property Services, Spruill said, plans to address the years of decay that have left the Catherine Street Apartments with so many flagrant code violations. "The reasoning for the eviction has nothing to do with non-payment of rent," the mayor said. "It's because of a change of ownership—they are desiring to totally rehab those buildings. And in order to do that, they have to remove the individuals from the location."

Spruill added that the evictions were "staggered," and some residents have indeed received eviction orders scheduled for the end of September, not August. She added that her understanding of the Friday eviction notice that had so disturbed residents and local activists had given residents three days, not three hours, to vacate. Regardless, Herrington stated that the majority of the residents have until Tuesday to leave the premises.

The Mississippi Free Press could not reach Ferretti Property Services for comment by press time, but left messages.

"At this point, what we're focusing our energy on is gathering community resources to rehouse these people as quickly as possible," Herrington said. But options are slim in a college town like Starkville. "Affordable housing is a joke here," Herrington finished.

### **'Time is Not On Our Side'**

Residents losing their homes next week face a dire world. The pandemic continues to roil Mississippi, and the impact of Hurricane Ida remains in flux for virtually the entire state. The Centers for Disease Control's eviction moratorium focused on evictions for non-payment of rent, but the intent was to prevent the dramatic, well-documented threats to public health and safety from any evictions.

"Evicted renters ... lead to multiple outcomes that increase the risk of COVID-19 spread," the CDC's moratorium explained. Evictions scatter families across broad areas, driving transmission across city, county and state lines. Those same families tend to move toward

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This cost has a measurement in human lives. "Counties with the highest population of crowded households have experienced COVID-19 mortality rates 2.6 times those of counties with the lowest proportion of crowded households," the CDC warned.

With Hurricane Ida expected to batter the state with storms as many residents lose their homes, Herrington hoped that storm shelters could provide the newly evicted families with a temporary shelter.

But Oktibbeha County NAACP Health Chairwoman Eileen Carr-Tabb worries that temporary solutions will fail many of the most vulnerable residents slated for eviction. "There are mothers that have small children being evicted. (There's) a mother with a school-age child who has mental disabilities. They've been there for years. What we're looking at is more than a physical impact, it's a mental impact," she told the Mississippi Free Press in an interview Saturday, Aug. 28.

Carr-Tabb paused, her voice quivering. Then she wept. "He understands something is happening, but what worries him is whether he'll still be able to walk to school," she said.

Families, too, are being torn apart by the blanket evictions. Relationships are broken up, she said, some returning to live with their families, and the others facing an uncertain future alone. "It's not just families and children," Carr-Tabb said. "It's men and women that are being broken apart and separated."

And it's coming faster than any of the residents imagined. "Time is not on our side," she said.

Young is praying for her family's future. She prays for her community—that the community can survive with so many scattered from their homes. "I'm hurt," she said. "I think we all are. But I know you're not supposed to question God, so I just pray that everything is in his hands."



### Nick Judin

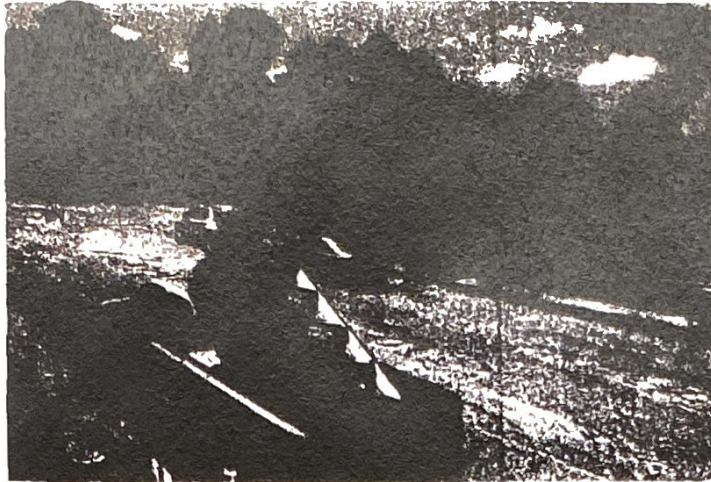
Nick Judin began his career in journalism at the Jackson Free Press in 2019, coming on as State Reporter to cover the 2020 legislative session. That posting quickly gave way to a year leading the JFP's COVID-19 coverage. Nick's reports from the frontline of coronavirus have repeatedly made national headlines, as he has asked hard questions of state leadership and done critical interviews with the state's top public-health experts. Email the Jackson, Miss., native at [nick@mississippifreepress.org](mailto:nick@mississippifreepress.org) and follow him on Twitter at [@nickjudin](https://twitter.com/nickjudin).

ALL POSTS



## Starkville Strong, NAACP join forces to help evicted residents

- Cal Brown | Staff Writer
- Aug 28, 2021



Many tenants were evicted from their homes at the Catherine Street apartments on Friday. Cal Brown, SDN

61 families were evicted from their homes at the Catherine Street apartments on Friday.

Tenants were given notices earlier this month to appear in court for their eviction hearings on August 18. On this court date, no one was asked to pay back rent, they had zero balance, and they were told to vacate immediately.

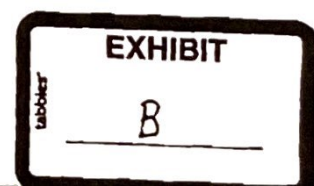
"The majority of these tenants are at or below the poverty line, so first month's rent and light deposits are overwhelming and impossible feats," Brandi Herrington of Starkville Strong said.

In the midst of all this, the eviction moratorium was extended until yesterday.

On Friday morning, Ferretti Property Services went to 61 units at the complex and told them they had to be out in three hours.

According to sources, when Maroon and White Realty sold the apartments to Ferretti Property Services, LLC, repairs, upkeep, and proper maintenance were not a priority before, during, and after the exchange of ownership. Tenants over the last two months have been living with subpar living conditions, similar to those of the Brookville Garden apartments.

For more on this story, check out the Saturday, August 28 edition of SDN.



## Evicted residents need help finding new housing

- Jessica Lindsey | Editor
- Aug 29, 2021



Brandi Herrington (center) of Starkville Strong and Yulanda Haddix (right) of the Oktibbeha County Chapter of the NAACP work in tandem to help those being evicted. Jessica Lindsey, SDN

On Saturday, Starkville Strong and the Oktibbeha County Chapter of the NAACP met at the Catherine Street apartments to help the residents who were informed they could no longer live there. Because everything happened so quickly on Thursday, many tenants at the apartments were left confused, and with Hurricane Ida approaching, it puts them in a rough spot.

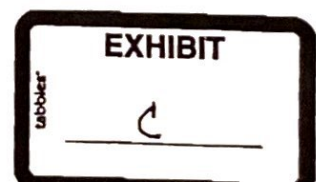
Thursday, 61 tenants were told they needed to vacate the premises in three hours without a judge-signed eviction order. Because of this, the 61 families are able to stay until Tuesday, August 31.

Brandi Herrington, Director of Starkville Strong, and Yulanda Haddix, President of the Oktibbeha County Chapter of the NAACP, called out to the community on Facebook for help for the residents of these apartments. With the help of volunteers, the two organizations got to work to inform the tenants who were available about the next steps going forward.

According to one tenant who would like to remain unnamed, once property ownership changed to Ferretti Property Services rent went up to \$550, but nothing was done about the conditions of the apartments. There are multiple tenants without running water and working refrigerators. There are people in their fourth month of the blistering summer without working air conditioning. There is sitting water in one apartment, and multiple residents reported pest issues from cockroaches to maggots.

Right now, everything that has happened to the tenants is legal in the state.

For more on this story, check out the Sunday, August 29 edition of SDN.





Spring Street Apartments, Starkville

Starkville Justice Court that you are to appear  
and states that you and your household are being

It is that Forrester Property Services is simply NOT vacat-  
ed and by the laws of the State of Mississippi we are allowed

You have been given notice more than 30-days in advance that you and your household must  
leave the property.

Any questions, you can call 662-645-3381 to leave a message and someone will get back with  
you. You can also email: [forrester@outlook.com](mailto:forrester@outlook.com)

Blake Forrester  
Owner

Stacy Forrester  
Manager

*Blake Forrester*

EXHIBIT

D



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Audriana Scales, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

Audriana Scales

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.



Krystal Pea  
Notary Public

STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,

Adrienne Scales, who, after reviewing the attached document and being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory Judgment and Other Relief*, is true to the best of his/her knowledge, information and belief.

Adrienne Scales

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August, 2021.



Krystal Pea  
Notary Public

STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Adam Hill, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

Adam Hill

SUBSCRIBED AND SWORN TO in my presence on this the \_\_\_\_\_ day of August,  
2021.



Krystal Pea  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Natasha Wilson, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

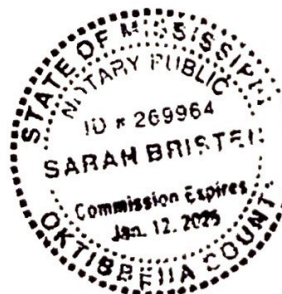
Natasha Wilson

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.

My Commission Expires:

Jan 12, 2025

[Signature]  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
CAROL GREGG, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

CAROL GREGG

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.

My Commission Expires:

Jan 12, 2025



Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Willie Rogers, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

WRogers

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.



Kristal Pen  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,

J. T. Rogers, who, after reviewing the attached document and being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory Judgment and Other Relief*, is true to the best of his/her knowledge, information and belief.

J. T. Rogers

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August, 2021.



Crystal Pea  
Notary Public

STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Golden Lee, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

Golden Lee

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.



Krystal Peas  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Mural Hee, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

Mural Hee

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.

My Commission Expires:

Jan 12, 2025

Sarah Brister  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,

Jawanda Robertson, who, after reviewing the attached document and being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory Judgment and Other Relief*, is true to the best of his/her knowledge, information and belief.

Jawanda Robertson  
on behalf of David Reed &  
Tommie C Reed

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August, 2021.



Krystal Pea  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Willy Lukaris, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

Wizel Aulov

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.

My Commission Expires:

Jan 12, 2023

[Signature]  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,

Latoya Lee, who, after reviewing the attached document and being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory Judgment and Other Relief*, is true to the best of his/her knowledge, information and belief.

Latoya Lee

SUBSCRIBED AND SWORN TO in my presence on this the \_\_\_\_\_ day of August, 2021.



Krystal Pea  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,

Tikia Young, who, after reviewing the attached document and being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory Judgment and Other Relief*, is true to the best of his/her knowledge, information and belief.

Tikia Young

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August, 2021.

My Commission Expires:

Jan 12, 2025

  
Notary Public



STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Frank Brown, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

Frank Brown

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.



Krystal Pea  
Notary Public

STATE OF MISSISSIPPI

COUNTY OF OKTIBBEHA

AFFIDAVIT

Personally appeared before me, the undersigned Notary Public,  
Kadejia Graham, who, after reviewing the attached document and  
being duly sworn, made oath that the within *Complaint for Injunctive Relief, Declaratory  
Judgment and Other Relief*, is true to the best of his/her knowledge, information and  
belief.

K. Graham

SUBSCRIBED AND SWORN TO in my presence on this the 31 day of August,  
2021.



Kristal Pea  
Notary Public



<b>COVER SHEET</b> <b>Civil Case Filing Form</b> (To be completed by Attorney/Party Prior to Filing of Pleading)		Court Identification Docket # <div style="display: flex; justify-content: space-around;"><div>53 County #</div><div>CH Judicial District (CH, CI, CO)</div><div>093121 Month Date Year</div></div>		Case Year <div style="border: 1px solid black; padding: 2px; display: inline-block;">2021</div>	Docket Number <div style="border: 1px solid black; padding: 2px; display: inline-block;">378</div> Local Docket ID
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2020)		Case Number If filed prior to 1/1/94	
In the CHANCERY		Court of OKTIBBEHA	County —	Judicial District	
Origin of Suit (Place an "X" in one box only)					
<input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal					
<b>Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form</b>					
Individual <u>SCALES</u> <u>LYNELL</u>					
Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____					
Business _____ Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: _____ D/B/A _____					
Address of Plaintiff <u>C/O VOLLOR LAW FIRM 127 E MAIN STREET, STARKVILLE, 39759</u>					
Attorney (Name & Address) <u>AUSTIN VOLLOR 127 E MAIN STREET, STARKVILLE, 39759</u> MS Bar No. <u>10459</u>					
Check (x) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing: _____					
<b>Defendant - Name of Defendant - Enter Additional Defendants on Separate Form</b>					
Individual _____					
Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: _____ Estate of _____ Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: _____ D/B/A or Agency _____					
Business <u>FERRETTI PROPERTY SERVICES, LLC</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: _____ D/B/A _____					
Attorney (Name & Address) - If Known _____ MS Bar No. _____					
Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet					
Nature of Suit (Place an "X" in one box only)					
<b>Domestic Relations</b> <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Term. of Parental Rights-Chancery <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____	<b>Business/Commercial</b> <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____	<b>Children/Minors - Non-Domestic</b> <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion <input type="checkbox"/> Minor Removal of Minority <input type="checkbox"/> Other _____	<b>Civil Rights</b> <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____	<b>Real Property</b> <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input checked="" type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____	
<b>Appeals</b> <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Municipal Court <input type="checkbox"/> Other _____	<b>Probate</b> <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Mental Health Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Joint Conservatorship & Guardianship <input type="checkbox"/> Hearship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment Sale <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Alcohol/Drug Commitment (Involuntary)	<b>Contract</b> <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____	<b>Statutes/Rules</b> <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	<b>Torts</b> <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Intentional Tort <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____	



IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_

PLAINTIFFS IN REFERENCED CAUSE - Page 1 of 7 Plaintiffs Pages  
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

**Plaintiff #2:**

Individual: SCALES AUDRIANNA (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Plaintiff #3:**

Individual: SCALES ADRIENNE (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

**Plaintiff #4:**

Individual: BROWN KRISTI (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_

PLAINTIFFS IN REFERENCED CAUSE - Page 2 of 7 Plaintiffs Pages  
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff # 5 :

Individual: HILL ADAM (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 6 :

Individual: WILSON NATASHA (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 7 :

Individual: KELLUM WANDA (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_



IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
 Prior to 1/1/94 \_\_\_\_\_

PLAINTIFFS IN REFERENCED CAUSE - Page 3 of 7 Plaintiffs Pages  
 IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff # 8 :

Individual: GREGG CAROLYN (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 9 :

Individual: HAYES GLENN (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 10 :

Individual: ROGERS WILLIE (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
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PLAINTIFFS IN REFERENCED CAUSE - Page 4 of 7 Plaintiffs Pages  
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff # 11 :

Individual: ROGERS J.T. \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

Plaintiff # 12 :

Individual: LEE GOLDEN \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

Plaintiff # 13 :

Individual: HILL MIRACL \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_



IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No Clerk's Local ID

Docket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_

PLAINTIFFS IN REFERENCED CAUSE - Page 5 of 7 Plaintiffs Pages  
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff # 14 :

Individual: REED TAMMIE (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 15 :

Individual: LUCIOUS KISSY (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 16 :

Individual: LEE LATOYA (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_



IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_

PLAINTIFFS IN REFERENCED CAUSE - Page 6 of 7 Plaintiffs Pages  
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff # 17 :

Individual: YOUNG TIKIA (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 18 :

Individual: CUMMINGS RACHEL (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 19 :

Individual: BROWN FRANK (\_\_\_\_\_) \_\_\_\_\_  
Last Name First Name Maiden Name, if Applicable Middle Init Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI  
JUDICIAL DISTRICT, CITY OF \_\_\_\_\_

Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID

Docket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_

PLAINTIFFS IN REFERENCED CAUSE - Page 7 of 7 Plaintiffs Pages  
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff # 20 :

Individual: GRAHAM KADEJIA ( \_\_\_\_\_ )  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # 21 :

Individual: GARDNER STARSHA ( \_\_\_\_\_ )  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 10459 Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_

Plaintiff # \_\_\_\_\_ :

Individual: \_\_\_\_\_ ( \_\_\_\_\_ )  
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_\_ Not an Attorney(✓) \_\_\_\_\_



IN THE CHANCERY COURT OF OKTIBBEHA COUNTY, MISSISSIPPI

LYNELL SCALES, AUDRIANNA SCALES, ADRIENNE SCALES,  
KRISTI BROWN, ADAM HILL, NATASHA WILSON,  
WANDA KELLUM, CAROLYN GREGG, GLENN HAYES,  
WILLIE ROGERS, J.T. ROGERS, GOLDEN LEE, MIRACL HILL,  
TAMMIE REED, KISSY LUCIOUS, LATOYA LEE, TIKIA YOUNG,  
RACHEL CUMMMINGS, FRANK BROWN, KADEJIA GRAHAM, and  
STARSHA GARDNER

PLAINTIFFS

VERSUS

CAUSE NO.: 21-378-S

FERRETTI PROPERTY SERVICES, LLC

DEFENDANT

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TEMPORARY RESTRAINING ORDER

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THERE CAME ON FOR CONSIDERATION THIS DAY, the Complaint of LYNELL SCALES, AUDRIANNA SCALES, ADRIENNE SCALES, KRISTI BROWN, ADAM HILL, NATASHA WILSON, WANDA KELLUM, CAROLYN GREGG, GLENN HAYES, WILLIE ROGERS, J.T. ROGERS, GOLDEN LEE, MIRACL HILL, TAMMIE REED, KISSY LUCIOUS, LATOYA LEE, TIKIA YOUNG, RACHEL CUMMMINGS, FRANK BROWN, KADEJIA GRAHAM, and STARSHA GARDNER, herein referred to as "Plaintiffs," requesting a temporary restraining order against FERRETTI PROPERTY SERVICES, LLC, and the court finds as follows:

1. Plaintiffs are adult resident citizens of Oktibbeha County, Mississippi.
2. Ferretti Property Services, LLC is a company located in Bolivar County, Mississippi that owns real estate interests in Oktibbeha County, Mississippi, namely Catherine Street Apartments. it may be served with process on its registered agent, David S. Norquist 150 North Sharpe Avenue, Cleveland, Mississippi 38732.





3. This Court has jurisdiction pursuant to Miss. Const. art. 6 § 159 and Miss. Code Ann. § 9-5-81, and venue is properly fixed in Oktibbeha County, Mississippi.

The Plaintiff has alleged the following facts.

1. Ferretti Property Services, LLC (Ferretti) purchased Catherine Street Apartments from Simmons Properties, LLC in May 2021.
  2. Ferretti allowed the Plaintiffs' leases to expire, upon which, each tenancy converted by operation of law to a month-to-month tenancy.
  3. Catherine Street Apartments are family and individual residential rental apartments located off of North Montgomery Street in Starkville, Mississippi.
  4. The tenants are typically lower income and impoverished citizens of Oktibbeha County, Mississippi with limited means to relocate quickly.
  5. Ferretti Property Services, LLC seeks to illegally evict tenants from the 65 housing units at Catherine Street Apartments. No tenants are subject to eviction due to nonpayment of rent.
  6. Ferretti did not give 30 days written notice to vacate as required in a month-to-month tenancy.
  7. Instead, Ferretti filed suit to evict some Plaintiffs on July 26, 2021, prior to any written notice. Some of the complaints were served after July 31, 2021.
  8. Ferretti and a number of the summoned Plaintiffs attended a hearing in the Justice Court of Oktibbeha County, Mississippi on August 18, 2021.
  9. Also, on August 18, 2021, Ferretti filed suit for eviction against the remaining Plaintiffs.
  10. As before, Ferretti failed to give 30 day written notices to these Plaintiffs prior
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to instituting suit. Instead, they attempted to provide written notices dated August 18, 2021. (EXHIBIT D)

11. On Friday, August 27, 2021, at approximately 9:00 a.m., agent(s) of Ferretti Property Services, LLC along with members of the Starkville Police Department went door to door informing tenants that they had to immediately remove themselves from the premises.
  12. On August 27, no Court order for eviction was signed or in place and based on information and belief, no signed order for eviction is currently in place.
  13. Tenants were not given sufficient notice prior to Ferretti Property Services, LLC's attempt to terminate their tenancy.
  14. Tenants have been notified by Ferretti Property Services, LLC that they must be out and will be removed from their homes on Tuesday, August 31, 2021.
  15. The removal of the tenants on August 31 violates their right to sufficient notice and illegally places the tenants and families in an impossible position to find alternative housing on such short notice.
  16. Pursuant to Sec. 89-7-35 Miss. Code Ann. removal without eviction warrant is improper.
  17. Pursuant to Sec. 89-8-19 Miss. Code Ann. notice for eviction provided to the Plaintiffs was improper.
  18. Upon information and belief, the removal of the Plaintiffs from Catherine Street Apartments is imminent.
  19. Such action would immediately and irreparably harm the residents removed from Catherine Street Apartments.
-

20. This Court should issue a temporary restraining order without notice to Ferretti Property Services, LLC enjoining it from removing or evicting tenants because such immediate and irreparable injury has been threatened and attempted already and may be carried out at any moment and because Plaintiffs have exhausted all means of otherwise preventing this damage.
21. It clearly appears from specific facts shown by the verified complaint that immediate and irreparable injury, loss or damage will result to Plaintiffs before the adverse party or their attorneys can be heard in opposition; specifically, irreparable injury to Plaintiffs' use and enjoyment of the property will occur.
22. Plaintiffs' counsel has certified to the Court in writing the efforts, if any, which have been made to give notice to the opposing party and reasons supporting his claim that notice should not be required.
23. This Order is issued without notice because the irreparable injury has been threatened and is imminent.

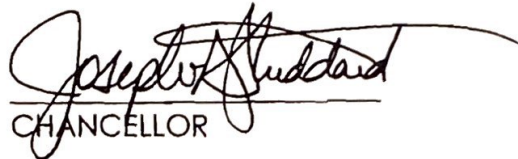
NOW, THEREFORE, IT IS ORDERED as follows:

- a) Ferretti Property Services, LLC, their officers, agents, servants, employees, and attorneys are hereby enjoined from removing or evicting any tenant at Catherine Street Apartments without proper notice.
  - b) A hearing on the matter of a preliminary injunction requested by the Plaintiffs in their Complaint is hereby set for the 8<sup>th</sup> day of September, 2021 at 9:00 a.m., at the Oktibbeha County <sup>Chancery</sup> Courthouse in Starkville, Mississippi;
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- c) This order shall expire ten (10) days after issuance, unless extended by the Court for good cause shown or unless the Defendant consents that it may be extended for a longer period; and
- d) The Plaintiffs are required to post security for the payment of such costs, damages, and reasonable attorney's fees as may be incurred or suffered by any party who is found to have been wrongfully enjoined or restrained in the amount of \$ 5,000<sup>00</sup>, such sum being deemed proper by the Court.

SO ORDERED, this the 31<sup>st</sup> day of August, 2021.

  
CHANCELLOR

ORDER ISSUE DATE: \_\_\_\_\_

ORDER ISSUE TIME: \_\_\_\_\_

Prepared by:

Austin Vollor, (MSB# 10459)  
Leoghain Strnad, (MSB# 105991)  
Attorneys for Plaintiff  
Vollor Law Firm, P.A.  
127 East Main Street  
Post Office Box 80120  
Starkville, Mississippi 39759  
Phone: (662) 323-0083  
Fax: (662) 323-7788