

**IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI**

**PHIL BYRANT**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO: 45CI1:23-cv-00238-JM**

**MARY MARGARET WHITE &  
DEEP SOUTH TODAY d/b/a MISSISSIPPI TODAY**

**DEFENDANTS**

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**RESPONSE OF DEFENDANTS TO PLAINTIFF'S MOTION FOR LEAVE OF COURT  
TO FILE AND SERVE THE THIRD AMENDED COMPLAINT [DOC. 120]**

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Come now Defendants Deep South Today d/b/a Mississippi Today and Mary Margaret White and file this their response to Plaintiff's motion to amend and serve his Third Amended Complaint and say they object to the proposed amendment and request the court to deny the motion.

Having to answer of the Complaint a fourth time is unreasonable and works an undue hardship on Defendants.

To allow the Complaint to be amended again only invites the Plaintiff to continue to move to amend ad infinitum.

The first publication in issue in this case is dated February 22, 2023, and the two publications subject to the most recent motion to amend are dated December 19, 2023, or ten months later.

The constant amendment to complaints should stop. Plaintiff is abusing the process of the Court.

The Court should deny the Plaintiff's motion to file a third amended complaint and award attorney's fees and costs to Defendants.

Respectfully submitted, this the 11th day of January, 2024.

*DEEP SOUTH TODAY d/b/a MISSISSIPPI TODAY* and MARY MARGARET WHITE,  
Defendants

By: s/ Henry Laird  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been filed with the Clerk of Court using this Court's MEC system and same was served on the following counsel of record:

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SO CERTIFIED, this the 11th day of January, 2024.

By: s/ Henry Laird  
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