

CYNTHIA KEITH, INDIVIDUALLY,  
AS DIRECTOR OF, AND ON BEHALF  
OF SHREVEPORT DOG PARK  
ALLIANCE, AN UNINCORPORATED  
ASSOCIATION

NUMBER 587,251-C

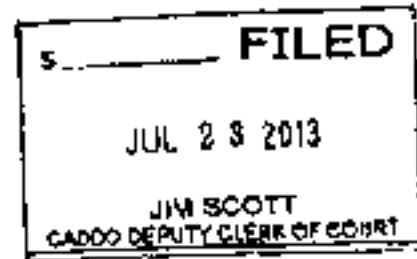
FIRST JUDICIAL DISTRICT COURT

VERSUS

PARISH OF CADDO

CEDRIC B. GLOVER, INDIVIDUALLY,  
AND AS DULY ELECTED MAYOR  
OF THE CITY OF SHREVEPORT

STATE OF LOUISIANA



PERMANENT ASSIGNMENT: JUDGE LEON L. EMANUEL  
SECTION "C"

#### RULE NISI

Now into court comes Petitioner, Cynthia Keith, individually, as director of, and on behalf of Shreveport Dog Park Alliance, an unincorporated association, who respectfully moves this Court to issue a Rule Nisi, directed to and commanding Respondent Cedric B. Glover, as duly elected Mayor of the City of Shreveport, to appear and show cause, if any he has, why the judgment of this Court making the Writ of Mandamus peremptory should not be executed and why the Respondent should not be held in contempt for his failure to comply with said judgment, including but not limited to the payment of costs in this matter.

1.

This matter came before the Court on May 16, 2013. Judgment was rendered in open court and signed May 30, 2013, granting the Petition for Writ of Mandamus, making said writ peremptory, ordering and commanding Respondent, Honorable Mayor Cedric B. Glover, to file written verification in the record that he has enforced the tenets of Resolution 133 of 2012, by Friday, June 21, 2013, at 2pm, or in default thereof to appear before this Honorable Court, June 26, 2013 at 9 a.m. to show cause why Respondent should not be held in contempt.

2.

The costs of the proceedings were assessed against the Office of the Mayor of the City of Shreveport.

3.

Petitioner sought and obtained a stay of execution, which was granted \*until July 8, unless and until otherwise stayed by the Court of Appeal, Second

Circuit." by order of June 18, 2013.

4.

Petitioner sought and obtained "an extension of the return date until July 22, 2013, within which to file its writ application, over the objection of Plaintiff."

5.

No further stay of execution was sought or obtained, nor is any in effect since July 8, 2013.

6.

Respondent has not complied with any of the provisions of the judgment, including but not limited to those pertaining to payment of costs by the Office of the Mayor.

7.

Petitioner has been required to obtain the services of an attorney at law to obtain this relief, and to the extent provided by law. Respondent should be cast with costs and reasonable attorneys fees.

WHEREFORE, Petitioner prays that a Rule Nisi issue directing and commanding Respondent Cedric B. Glover, as duly elected Mayor of the City of Shreveport, to appear and show cause, if any he has, why the judgment of this Court making the Writ of Mandamus peremptory should not be executed and why the Respondent should not be held in contempt for his failure to comply with said judgment, including but not limited to the payment of costs in this matter.

Respectfully,




Daniel R. Keele  
Bar Roll No. 18975  
P.O. Box 303  
Shreveport, LA 71162-0303  
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**CERTIFICATE**

I hereby certify that a copy of the above and foregoing pleading has been transmitted by fax or other electronic means to all counsel of record and by placing same in the United States mail, properly addressed and postage prepaid.

Ronald F. Lattier  
330 Marshall, Suite 1411  
Shreveport, LA 71101

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330 Marshall, Suite 1411  
Shreveport, LA 71101

  
\_\_\_\_\_  
Daniel R. Keele

CYNTHIA KEITH, INDIVIDUALLY,            NUMBER 567,251-C  
AS DIRECTOR OF, AND ON BEHALF  
OF SHREVEPORT DOG PARK  
ALLIANCE, AN UNINCORPORATED        FIRST JUDICIAL DISTRICT COURT  
ASSOCIATION  
VERSUS                                        PARISH OF CADDO  
CEDRIC B. GLOVER, INDIVIDUALLY,  
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OF THE CITY OF SHREVEPORT

PERMANENT ASSIGNMENT: JUDGE LEON L. EMANUEL  
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**ORDER**

Considering the foregoing, IT IS ORDERED that a Rule Nisi issue, directing and commanding Respondent Cedric B. Glover, as duly elected Mayor of the City of Shreveport, to appear and show cause, if any he has, on the \_\_\_\_ day of August, 2013 at \_\_\_\_\_ o'clock \_\_\_\_.M., why the judgment of this Court making the Writ of Mandamus peremptory should not be executed and why the Respondent should not be held in contempt for his failure to comply with said judgment, including but not limited to the payment of costs in this matter.

Shreveport, Louisiana, this \_\_\_\_ day of July, 2013.

\_\_\_\_\_  
Judge Leon L. Emanuel  
First Judicial District

Prepared by:  
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