SEVENTH (7TH) CIRCUIT COURT SECOND JUDICIAL DISTRICT OF HINDS COUNTY, MISSISSIPPI

BETTY L. SMITH (FORMERLY HEARN)
PLAINTIFF

Civil Action(s): 24-22 Refiling: 25CH2:15-cv-000016

25CH2:15-cv-000101

VS.

HINDS COUNTY BOARD OF SUPERVISORS
SUPERVISORS ROBERT GRAHAM, BOBBY MCGOWAN,
AND DEBORAH BUTLER-DIXON; DION QUINN (PUBLIC WORKS);
THELMA OWENS (PRIVATE ACTOR);
AND JOHN/JANE DOE(S)
DEFENDANTS

MOTION FOR DEFAULT JUDGMENT

Comes now, Betty L. Smith (hereafter "Plaintiff"), pro se, pursuant to Rule 55(b) of the Mississippi Rules of Civil Procedure, requesting entry of a Default Judgment, including court ordered mediation conferences and/or hearings, if and as this Court deems necessary and proper, to carry its judgment into effect.

I. Background

- 1. September 19, 2024: Application to Clerk for Entry of Default and Supporting Affidavit filed
- 2. August 4, 2024: Summons served upon Ms. Thelma Owens
- 3. July 30, 2024; Summons served upon the Clerk of the Hinds County Board of Supervisors (HCBS) in and on behalf of the HCBS and Supervisors Robert Graham, Bobby McGowan, and Deborah Butler-Dixon, and Dion Quinn (Public Works)
- 4. July 9, 2024: Civil Case filing Form filed, by Plaintiff.
- 5. July 9, 2024: Complaint filed, by Plaintiff.

II. Summary

6. Plaintiff requests that this court:

a. confirm title to Plaintiff, removal of Plaintiff's property from the Hinds County Road
 Inventory, and issue injunctions ejecting and prohibiting unauthorized trespasses.

b. grant the \$2,000,000 compensatory and punitive damages stipulated by the Plaintiff or determine an equitable amount for the (1) continuing deprivation and ensuing effects upon her business property, (2) disenfranchisement of her right and ability to earn the intended income and further the generational wealth intended by Plaintiff's ancestors; (3) Plaintiff's pain and suffering. See Exhibit A.

III. Certification

I certify that Plaintiff, on September 19, 2024, mailed a copy of this motion to The Honorable Robert Graham, President, Hinds County Board of Supervisors, 316 S. President Street, Jackson, MS 39201, Ms. Thelma Owens, 1072 Smith Drive, Raymond, MS 39154, and Mr. Kenneth R. Dreher, 111 Hillmont Circle, Clinton, MS 39056, Counsel to the Honorable Isla Tullos.

Respectfully submitted,

Betty L. Smith (formerly Hearn), pro se 13014 N Dale Mabry Highway, 321 Tampa, Florida 33618

day of Siphember, 2024.

813-451-2337

Sworn to and subscribed before me this the

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Notary Public
State of Florida
Comm# HH500284
Expires 3/5/2028

Notary Public

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