

16TH JUDICIAL DISTRICT COURT FOR THE PARISH OF LAFAYETTE
STATE OF LOUISIANA

NO. 90,830

DIVISION: B

ST. MARTIN PARISH GOVERNMENT

v.

BILLY BROUSSARD ET AL.

DEFENDANT’S FIRST SET OF INTERROGATORIES

PURSUANT to Article 1457 of the Louisiana Code of Civil Procedure, Defendant, in proper person, propounds the following set of Interrogatories to Plaintiff, to be answered under oath and within the time period prescribed by law.

I.

INSTRUCTIONS

Defendant is requesting interrogatories according to the following instructions.

- A. These Interrogatories are continuing in character so as to require the Defendant file supplemental answers if he obtains different or further information prior to trial.
- B. A request to identify a person or entity shall require that Defendant state the correct full name, address, and occupation of each person or entity.
- C. Where any answer to an Interrogatory is based upon the personal knowledge of a person other than the person signing the answer, Defendant should provide a concise factual account of the basis for the answer and state when, where, and by whom and under what circumstances the person signing the answer first obtained the information regarding said answer.
- D. A request to identify conversations or other oral communication shall require that such communication be identified as to the date it took place, the identity of the person involved, the time, place, and factual circumstances of the communication, a complete statement of the content of the communication, and identification of notes, memorandum, or any other written or otherwise recorded form of the communication.
- E. Any request to identify documents, correspondence, letters, or other written or transcribed communications shall require that each such communication be identified by stating its nature and the date of its preparation and transmittal, the identity of the person who prepared and signed it, the identity of the person to whom it was transmitted, and a complete statement of its content.
- F. If Defendant objects to any Interrogatory or any portion thereof or fails to answer any Interrogatory or any portion thereof on the ground that a complete answer would include information that is privileged or falls within the work product doctrine, then in each instance state:
 - 1. The nature of the privileged claim;
 - 2. Whether the allegedly privileged communication was oral or in writing.
 - a. If in writing, identify each such communication, and

- b. Any other facts relied upon to establish that the privilege has been properly claimed.

DEFINITIONS

The following definitions shall apply for the purposes of this request:

- A. "Documents" shall mean, unless otherwise indicated, any letter, correspondence, telegram, memorandum, records, ledgers, accounts, journals, diaries, minutes, contracts, leases, memoranda, or records of telephone or personal conversations or conferences, interoffice communications, microfilm, tape recordings, and other records, reports, opinion letters, analyses, work sheets, checks, desk calendars, appointment books, photographs, diagrams, charts, maps, graphs, invoices, title abstracts, and all writings or recordings of any nature whatsoever. Where originals are not available, copies of such documentation may be produced.

II.

INDIVIDUAL INTERROGATORIES

INTERROGATORY NUMBER ONE:

Please state any and all parties with whom Plaintiff has corresponded on a one-on-one basis (but to include telephone conference calls, if applicable) other than St. Martin Parish Government employees and its attorney regarding the property located at 1675 Duchamp Road, Broussard Louisiana 70518.

INTERROGATORY NUMBER TWO:

For each itemization in response to Interrogatory Number One above, please state the nature of the discussion which transpired.

INTERROGATORY NUMBER THREE:

Please state the name and address of any individual filing a complaint with St. Martin Parish Government entailing the property located at 1675 Duchamp Road, Broussard, Louisiana 70518.

INTERROGATORY NUMBER FOUR:

Please state the nature of each complaint itemized in Interrogatory Number Three above.

INTERROGATORY NUMBER FIVE:

Please state with specificity any surveillance activity any official with the St. Martin Parish Government has engaged in regarding the property at 1675 Duchamp Road, Broussard, Louisiana 70518.

INTERROGATORY NUMBER SIX:

Please state any basis upon which St. Martin Parish Government asserts that any violation of any Louisiana DEQ regulation is transpiring at the property located at 1675 Duchamp Road, Broussard, Louisiana 70518.

INTERROGATORY NUMBER SEVEN:

Please state the date of any communication that Plaintiff has engaged in any discussion with Louisiana DEQ officials regarding the property at 1675 Duchamp Road, Broussard, Louisiana 70518 to include the DEQ official's name, the nature of the discussion, and any communication which the DEQ official made to any St. Martin Parish Government official.

INTERROGATORY NUMBER EIGHT:

Please provide with specificity the date and nature of any oral communications transpiring between any St. Martin Parish Governmental official and Louisiana State Trooper Scott Lopez regarding the property located at 1675 Duchamp Road, Broussard, Louisiana 70518.

INTERROGATORY NUMBER NINE:

Please state the degree to which any St. Martin Parish official has been “working with” Louisiana State Trooper Scott Lopez regarding any measure taken or contemplated to be taken regarding the property located at 1675 Duchamp Road, Broussard, Louisiana 70518. In responding to Interrogatory Number Nine, please include the specific acts in which St. Martin Parish Government officials requested for Trooper Lopez to engage in or any acts which Trooper Lopez agreed to perform of his own volition in furtherance of any measure taken or contemplated to be taken regarding the property located at 1675 Duchamp Road, Broussard, Louisiana 70815.

INTERROGATORY NUMBER TEN:

Please indicate the basis upon which St. Martin Parish Governmental officials deem the property located at 1675 Duchamp Road Broussard, Louisiana 70518 to be a “nuisance.”

INTERROGATORY NUMBER ELEVEN:

Please indicate the dates, times, and natures of any communications which St. Martin Parish Government employees engaged in oral discussions with members of the St. Martin Parish Government Council regarding the property located at 1675 Duchamp Road, Broussard, Louisiana 70518.

INTERROGATORY NUMBER TWELVE:

Please indicate any and all past properties in which an applicant for zoning has been asked to appear before the St. Martin Parish Zoning Commission and respond to questions entailing farming operations. In response to Interrogatory Number Twelve, please state the name of the applicant, the zoning being sought, and the zoning existing for the property prior to application. Please also state the applicant number and the date on which the application was deliberated by the St. Martin Parish Zoning Commission.

INTERROGATORY NUMBER THIRTEEN:

Please state any and all nuisance lawsuits filed by St. Martin Parish Government for the period January 1, 2014 to present. Please state the case number, the defendant, the nature of the nuisance property, and the end result of the litigation.

INTERROGATORY NUMBER FOURTEEN:

Please state all instances in which St. Martin Parish Government officials have hauled its debris onto privately-owned property for which no landfill permit or license exists from the dates of January 1, 2014 through March 2, 2022.

INTERROGATORY NUMBER FIFTEEN:

Please state the nature and brief summary of the content of any telephone conversation between St. Martin Parish Government Parish President Chester Cedars, Planning and Zoning Coordinator Morgan Allemond, and any DEQ official(s).

INTERROGATORY NUMBER SIXTEEN:

Please state the date and approximate time of any oral communications transpiring between St. Martin Parish Government President Chester Cedars and *Daily Iberian* reporter Dwayne

Fatherree entailing Defendant's property located at 1675 Duchamp Road, Broussard, Louisiana 70518.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing instrument has this day been served on all parties through their counsel of record in this proceeding by:

- Hand Delivery Prepaid U.S. Mail Email
 Facsimile Overnight Mail Service

Breaux Bridge, Louisiana, this 3rd day of March, 2022.


BILLY BROUSSARD, in proper person