

BILLY BROUSSARD

VERSUS NO. 92077-F

MENDY GIROUARD, ET AL

*

16TH JUDICIAL DISTRICT COURT

*

PARISH OF ST. MARTIN

*

STATE OF LOUISIANA

MOTION TO COMPEL DISCOVERY

NOW INTO COURT, in proper person, comes Plaintiff, BILLY BROUSSARD who moves this Court as follows:

1.

On or about October 28, 2022, Plaintiff served upon the Defendant, **MENDY GIROUARD**, through her Counsel of Record, Eric Timothy Haik, Requests for Production of Documents seeking information vital to Plaintiff's case. (See attached, Exhibit A- Request for Production of Documents).

2.

On November 16, 2022, Defendant MENDY GIROUARD, through her Counsel, Eric Timothy Haik, indicated by U. S. Certified Mail that she was improperly withholding the requested production of documents. (See attached, Exhibit B – Certified Letter from Eric Timothy Haik dated November 16, 2022).

3.

On November 18, 2022, upon receipt of the Certified Letter referenced in Paragraph 2 above, Plaintiff notified Defendant MENDY GIROUARD, through her Counsel of Record, Eric Timothy Haik, that her response was unacceptable to Plaintiff and seeking to conduct a Rule 10.1 Status Conference on Tuesday, November 22, 2022 at 10:00 a.m. (See attached, Exhibit C - Plaintiff's E-mail correspondence with Defendant MENDY GIROUARD through her Counsel of Record, Eric Timothy Haik, with all such emails occurring on Friday, November 18, 2022).

4.

Given the response/ objection by Defendant, **MENDY GIROUARD**, communicated through her Counsel of Record, Eric Timothy Haik, Plaintiff asserts that he has been notified that Defendant **MENDY GIROUARD**'s Facebook Group, "Vieux Jacquet Neighborhood," contains numerous posts which are blatantly-defamatory against Plaintiff and, further, that those posts are of a vicious nature and were made

with demonstrated actual malice against Plaintiff.

5.

It is therefore moved that Defendant, **MENDY GIROUARD**, show cause, if any she can, why she should not be ordered to produce the documents requested in Plaintiff's Request for Production of Documents No. 1 together with all costs of this Motion.

6.

Plaintiff states that he has complied with Rule 10.1 of the Uniform-Rules for Civil Procedure in District Court in attempting to amicably resolve the discovery dispute but to no avail.

WHEREFORE, Plaintiff, **BILLY BROUSSARD** prays that a Rule be issued herein, directing Defendant, **MENDY GIROUARD**, to show cause, if any, why she should not be ordered to produce the documents requested in Plaintiff's Request for Production of Documents propounded upon Defendant **MENDY GIROUARD** and to pay unto Plaintiff all costs of this Motion.

Respectfully Submitted,
Billy Broussard

BY: _____

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has this day been forwarded to all known counsel of record by:

☐ United States mail, properly addressed and postage prepaid.

☐ Registered United States mail, return receipt requested, properly addressed and postage prepaid.

☐ Facsimile transmission.

☐ Hand Delivery.

☒ E-mail Transmission.

Breaux Bridge, Louisiana, this 21st day of November, 2022.

RECEIVED AND FILED
2022 NOV 21 AM 11:33

DEPUTY CLERK OF COURT
ST. MARTIN PARISH

BY: _____

Billy Broussard, in proper person.

BILLY BROUSSARD	*	16 TH JUDICIAL DISTRICT COURT
VERSUS NO. 92077 "F"	*	PARISH OF ST. MARTIN
MENDY GIROUARD AND MELISSA DUBROC	*	STATE OF LOUISIANA

REQUESTS FOR PRODUCTION OF DOCUMENTS

TO: ERIC T. HAIK (#28066)
1017 E. Dale Street
Post Office Box 11040
New Iberia, LA 70562-1040
Phone: (337) 365-5486
Facsimile: (337) 367-7069
Attorney for Defendants

NOW COMES Plaintiff, BILLY BROUSSARD, in proper person, who propounds the following Request for Production of Documents to Defendant Mendy Girouard through her counsel of record, Eric T. Haik (#28066) to be responded to, in writing, within thirty (30) days after receipt hereof pursuant to Article 1462 *et seq.* of the Louisiana Code of Civil Procedure, which requests shall be deemed continuing.

DEFINITIONS AND INSTRUCTIONS

The following definitions and/or abbreviations are set forth for the purpose of clarifying the meaning of various words and/or phrases contained herein in order to expedite discovery and to simplify and assist your efforts to locate and furnish the relevant information. It is expressly stipulated and agreed that an affirmative response on your part will not be construed as an admission that any definition or abbreviation contained herein is either factually correct or legally binding on you.

1. "YOU, "YOUR," and "YOURS" refer to Defendant, MENDY GIROUARD and include her agents, representatives, attorneys and all other persons acting or purporting to act on her behalf or under her control. Further, this definition refers to the parties to whom these Requests for Productions are addressed and propounded and all representatives of those parties, acting or purporting to act on her behalf with respect to any matter inquired about in these Requests for Production including but not limited to, all employees, employs, consulting agents, adjustors or any other representative.
2. "Defendant" refers to Defendant named in the above-styled and numbered cause, including MENDY GIROUARD's agents, representatives, attorneys and all other persons acting or purporting to act on her behalf or under her control.

Exhibit "A"

3. "Statement(s)" as that term is used herein includes, (a) a written statement signed or otherwise adopted or approved by the person making it; and (b) any stenographic, mechanical, electrical or other recording, or any transcription thereof which is substantially a verbatim recital of a statement made by the person and contemporaneously recorded.
4. "Document" shall mean writings of every kind, source, and authorship, including originals, copies of all non-identical copies thereof, in your possession, custody or control or known by you to exist, including with limitations and governmental agency, department, administrative entity, or personnel. This term shall include handwritten, typewritten, printed, photocopied, photographic or recorded material and any and all attachments to the original material and any and all documents referred to in the original; and any and all subsequent additions, deletions, substitutions, amendments or modifications to the original of any sort. It shall include communications, in words, symbols, pictures, sound recordings, films, tapes and information stored in or accessible through computer or other information on storage or retrieval systems, together with the codes and/or programming instructions and other materials necessary to understand and use such systems. For purposes of illustration and not limitation, the terms shall include: correspondence; transcriptions of testimony; letters; notes; reports; papers; files; books; records; contracts; agreements; telegrams; teletypes; and other communications sent or received; diaries; calendars; logs, notes or memoranda of telephonic or face-to-face conversations; drafts; work papers; agendas; bulletins; notices; circulars; announcements; instructions; schedules; minutes; summaries, notes, and other records and recordings of any conference, meetings, visits, statements, interviews or telephone conversations; bills, statements, and other records of obligations and expenditures; cancelled checks, vouchers, receipts, and other records of payments; ledgers, journals, balance sheets, profit and loss statements, and other sources of financial data; analyses; statements; interviews; affidavits; printed matter (including published books, articles, speeches and newspaper clippings); manuals; brochures; parts lists; memoranda of all kinds to and from any persons, agencies or entities; technical and engineering reports, evaluations, advises, recommendations, commentaries, conclusions, studies, test plans, manuals, procedures, data reports, results and conclusions; records of administrative, technical and financial actions taken or recommended; and all other writings the contents of which relate to, discuss, consider or otherwise refer to the subject matter of the particular discovery requested.
5. "Expert" means any expert who is expected to testify at trial, either in your case in chief or rebuttal, by depositions or live testimony, and any expert who has been informally consulted with, retained or specially employed in anticipation of litigation or preparation for formal hearing but will not be called to testify.
6. "Identify" when referring to:
 - (a) a person, means to state his/her full name and present or last known business and residential address and business and residential phone number;
 - (b) a public or private corporation, partnership, association, or other governmental agency, means to state its full name and present or last known pertinent business address and phone number;
 - (c) a statement, means to identify who made it, who took or recorded it, and all others, if any, present during the making thereof; to state

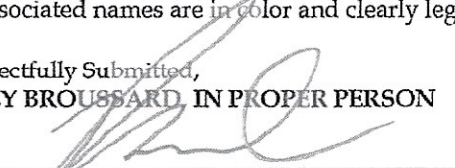
- when, where and how it was taken or recorded, and to identify who has present or last known possession, custody or control;
- (d) a document, means to give a reasonably detailed description thereof, including, if applicable, when, where and how it was made; to identify who has present or last known possession, custody or control thereof; and
 - (e) any other tangible thing, means to give a reasonably detailed description thereof, including, if applicable, when, where and how it was made; to identify who made it, and to identify who has present or last known possession, custody or control thereof.
7. The word "concerning" includes referring to, alluding to, responding to, relating to, in connection with, commencing on, in respect of, about, regarding, discussing, showing, describing, mentioning, reflecting, analyzing, constituting, evidencing, or pertaining to.
 8. "Communication" means any contact between two or more persons, companies, corporations, joint ventures or partnerships and shall include, without limitation, written contact by means such as letters, memoranda, telegrams, telecopies or telexes, or by any document, and any oral contract such as face-to-face meetings and telephone conversations.
 9. Whenever the masculine gender is used herein, it should be taken to include the feminine gender where appropriate.
 10. The singular includes the plural, and the plural includes the singular.
 11. "And" includes and/or.
 12. "Or" includes and/or.
 13. If you object or refuse to respond to a Request for Production on the ground that it falls within a privilege or exemption or for any other reason, please provide the following information as to each Request for Production not answered: (a) The identity of the information that you claim privileged (if the information has been reduced to a document, please identify as defined in the instruction above); (b) the identity of each person known to you to have seen the item; and (c) the nature of the privilege or exemption you claim applies and the reason you invoke it.
 14. If any document referred to in your answers to these Requests for Production were, but no longer are, in your possession, custody or control, or the control of your agents or representatives, state whether it (1) is missing or lost, (2) has been destroyed, (3) has been transferred to others, identifying the recipient; and, (4) describe the circumstances surrounding any disposition of the document.

REQUEST FOR PRODUCTION NO. 1:

Please produce copies of any/all Facebook posts made on the Facebook group "Vieux Jacquet Neighborhood" managed by Defendant Mendy Girouard containing reference to Billy Broussard and/or his property on Duchamp Road from inception through October 28, 2022. Please ensure that all posts include all comments made on

such posts which are un-collapsed and fully visible and legible upon submission. Also ensure that all emoji reactions to such posts and comments are provided in the printouts of the posts and/or ensuing comments on those posts, to include the names of the persons making the reactions, thus requiring the un-collapsed reactions to be readily visible and legible upon printing. Please ensure that all printouts of the Facebook posts, comments, and emoji reactions with associated names are in color and clearly legible.

Respectfully Submitted,
BILLY BROUSSARD, IN PROPER PERSON

BY: 
BILLY BROUSSARD
In Proper Person
1307 South Main
Breaux Bridge, LA 70517
Billy@BillyBroussard.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has this day been forwarded to all known counsel of record by:

- ☐ United States mail, properly addressed and postage prepaid.
- ☐ Registered United States mail, return receipt requested, properly addressed and postage prepaid.
- ☐ Facsimile transmission.
- ☐ Hand Delivery.
- ☒ E-mail Transmission.

Breaux Bridge, Louisiana, this 28 day of October, 2022.

BILLY BROUSSARD
In Proper Person
1307 South Main
Breaux Bridge, LA 70517

BY: 
BILLY BROUSSARD

RECEIVED AND FILED

2022 NOV 21 AM 11:33

DEPUTY CLERK OF COURT
ST. MARTIN PARISH



HAIK MINVIELLE GRUBBS & D'ALBOR
ATTORNEYS AT LAW

T.M. "TED" HAIK, JR.
LEON J. MINVIELLE, III
JULIUS W. "WILL" GRUBBS, JR.
ERIC TIMOTHY HAIK
JEAN PAUL "J.P." D'ALBOR
ALEXANDRA "ALI" LEBLANC

C. THOMAS BIENVENU, JR. (1936-2022)

November 16, 2022

CERTIFIED MAIL

NO. 7021 0950 0000 6708 6311

RETURN RECEIPT REQUESTED

Mr. Billy Broussard
1307 South Main
Breaux Bridge, LA 70517

RE: *Billy Broussard vs. Mendy Girouard, et al*
Docket No. 92077-F, 16th JDC, Parish of St. Martin

Dear Mr. Broussard:

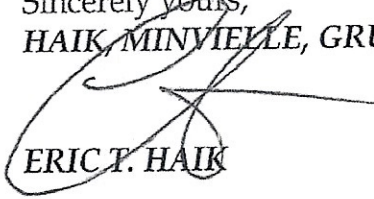
In connection with the above referenced matter, please find enclosed *Defendant's Responses to Request for Production* propounded upon my clients, Mendy Girouard and Melissa Dubroc.

Please note that the original has been retained by this office and are not being filed into the record of this matter according to LSA-C.C.P. Art. 1474(B).

Should you have any questions concerning this matter, please feel free to contact my office.

With best regards, I remain

Sincerely yours,
HAIK, MINVIELLE, GRUBBS & D'ALBOR


ERIC T. HAIK

ETH:eoc
Enclosure
cc/enc.:

Mrs. Mendy Girouard
Mrs. Melissa Dubroc

Please reply to
1017 E Dale Street
P. O. Box 11040
New Iberia, LA 70562-1040

P 337.365.5486
F 337.367.7069

Satellite Office
201 St. Charles Avenue, Ste. 2500
New Orleans, LA 70170

P 800-491-9853

ehaik@hmg-law.com
WRITER'S EMAIL
hmg-law.com

Exhibit "B"

BILLY BROUSSARD

*

16TH JUDICIAL DISTRICT COURT

VERSUS NO. 92077 "H"

*

PARISH OF ST. MARTIN

MENDY GIROUARD AND
MELISSA DUBROC

*

STATE OF LOUISIANA

DEFENDANTS' RESPONSES TO REQUEST FOR PRODUCTION

TO: BILLY BROUSSARD
In Proper Person,
1307 South Main
Breaux Bridge, LA 70517

NOW COME Defendants, MENDY GIROUARD AND MELISSA DUBROC (hereinafter "Defendants"), who respond to the discovery propounded by Petitioner, BILLY BROUSSARD (hereinafter "Petitioner"), as follows:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce copies of any/all Facebook posts made on the Facebook group "Vieux Jacquet Neighborhood" managed by Defendant Mendy Girouard containing reference to Billy Broussard and/or his property on Duchamp Road from inception through October 28, 2022. Please ensure that all posts include all comments made on such posts which are un-collapsed and fully visible and legible upon submission. Also ensure that all emoji reactions to such posts and comments are provided in the printouts of the posts and/or ensuing comments on those posts, to include the names of the persons making the reactions, thus requiring the un-collapsed reactions to be readily visible and legible upon printing. Please ensure that all printouts of the Facebook posts, comments, and emoji reactions with associated names are in color and clearly legible.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Defendant's hereby object to the request for production for being irrelevant and not likely to lead to any admissible evidence in regards to Plaintiff's claims of defamation and/or slander being that the "Vieux Jacquet Neighborhood" Facebook group page is a private group and not for public visit or viewing. Each member of the page must be approved by the administrator to join the page.

Respectfully Submitted,

HAIK, MINVIELLE, GRUBBS & D'ALBOR, LLP

BY: 

ERIC T. HAIK (#28066)

1017 E. Dale Street

Post Office Box 11040

New Iberia, LA 70562-1040

Phone: (337) 365-5486

Facsimile: (337) 367-7069

Attorney for Mendy Girouard and Melissa Dubroc

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has this day been forwarded to all known counsel of record by:

☐ United States mail, properly addressed and postage prepaid.
☒ Registered United States mail, return receipt requested, properly addressed and postage prepaid.

☐ Facsimile transmission.

☐ Hand Delivery.

☐ E-mail Transmission.

New Iberia, Louisiana, this 16 day of Nov., 2022.

HAIK, MINVIELLE, GRUBBS & D'ALBOR

BY: 

ERIC T. HAIK

From: Eric Haik <ehaik@hmg-law.com>
Date: November 18, 2022 at 12:08:12 PM CST
To: Billy Broussard <billy@billybroussard.com>
Cc: Elaina Champagne <echampagne@hmg-law.com>, Ali LeBlanc <ali@hmg-law.com>
Subject: RE: Scheduling Rule 10.1 Status Conference, Case #: 92077-F, Billy Broussard v. Mendy Girouard and Melissa Dubroc

Mr. Broussard

In lieu of a phone conference, You can use this email as my 10.1 response. We rely on our objection for purposes of our position to not produce. Feel free to file your MTC.

Eric T. Haik



HAIK MINVIELLE, GRUBBS, & D'ALBOR, LLP
Attorneys at Law

Main Office:

1017 E Dale Street
P. O. Box 11040
New Iberia, LA 70562-1040
P (337) 365-5486
F (337) 367-7069
Website: hmg-law.com
Email: ehaik@hmg-law.com

New Orleans Satellite Office:

201 St. Charles Avenue, Suite 2500
New Orleans, LA 70170
P (504) 754-6966
F (504) 524-7979

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From: Billy Broussard <billy@billybroussard.com>
Sent: Friday, November 18, 2022 12:00 PM
To: Eric Haik <ehaik@hmg-law.com>
Cc: Elaina Champagne <echampagne@hmg-law.com>; Ali LeBlanc <ali@hmg-law.com>
Subject: Re: Scheduling Rule 10.1 Status Conference, Case #: 92077-F, Billy Broussard v. Mendy Girouard and Melissa Dubroc

Mr. Haik.

I look forward to your call.

Sent from my iPhone

Exhibit "C"

On Nov 18, 2022, at 11:43 AM, Eric Haik <ehaik@hmg-law.com> wrote:

Mr. Broussard

I will be in mediation in Nola all day on 11/22 but I can try to call you at some point to have our 10.1.

Eric T. Haik

<image002.jpg>

HAIK MINVIELLE, GRUBBS, & D'ALBOR, LLP
Attorneys at Law

Main Office:

1017 E Dale Street
P. O. Box 11040
New Iberia, LA 70562-1040
P (337) 365-5486
F (337) 367-7069
Website: hmg-law.com
Email: ehaik@hmg-law.com

New Orleans Satellite Office:

201 St. Charles Avenue, Suite 2500
New Orleans, LA 70170
P (504) 754-6966
F (504) 524-7979

CONFIDENTIALITY NOTICE: The email transmission (and/or attachments accompanying it) may contain confidential information belonging to the sender which is protected by the Attorney/Client Privilege. The information is intended only for the use of the recipient named above. If you have received the email in error, please notify us immediately by telephone (337-365-5486 or 1-800-491-9853). You are cautioned that any disclosure, copying, distribution or other use of the transmitted information is strictly prohibited.

From: Billy Broussard <billy@billybroussard.com>

Sent: Friday, November 18, 2022 11:21 AM

To: Eric Haik <ehaik@hmg-law.com>

Cc: Elaina Champagne <echampagne@hmg-law.com>

Subject: Scheduling Rule 10.1 Status Conference, Case #: 92077-F, Billy Broussard v. Mendy Girouard and Melissa Dubroc

Mr. Haik,

This email will document the fact that I am in receipt of your letter dated November 16, 2022 in which you indicate Defendant Mendy Girouard objects to my one discovery item entailing production of documents for posts made on her Facebook group entailing me and/or my Duchamp Road property.

In light of the letter's contents, we need to schedule a Rule 10.1 Status Conference for Tuesday, November 22, 2022 at 10:00 a.m.

As you are aware, this is required prerequisite for filing a Motion to Compel Discovery, and I will be filing just a Motion if your Defendant's position doesn't change.

I look forward to speaking with you via phone on Tuesday of next week at 10 a.m.

Thank you!
Billy Broussard

Sent from my iPhone

BILLY BROUSSARD

*

16TH JUDICIAL DISTRICT COURT

VERSUS NO. 92077 "F"

*

PARISH OF ST. MARTIN

MENDY GIROUARD AND
MELISSA DUBROC

*

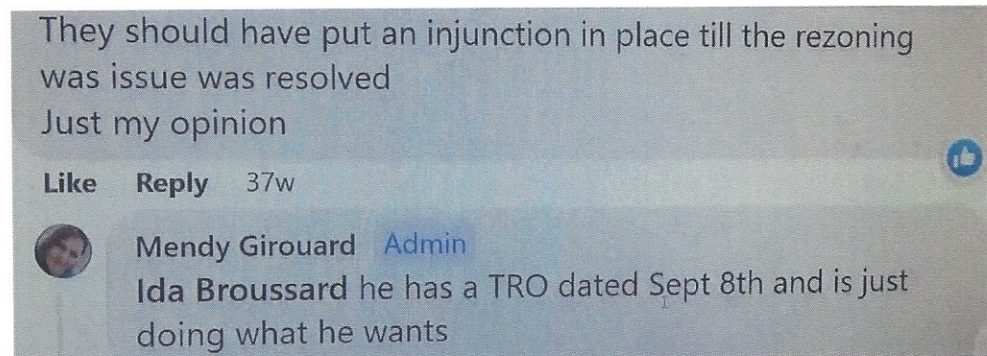
STATE OF LOUISIANA

MEMORANDUM IN SUPPORT OF MOTION TO COMPEL DISCOVERY

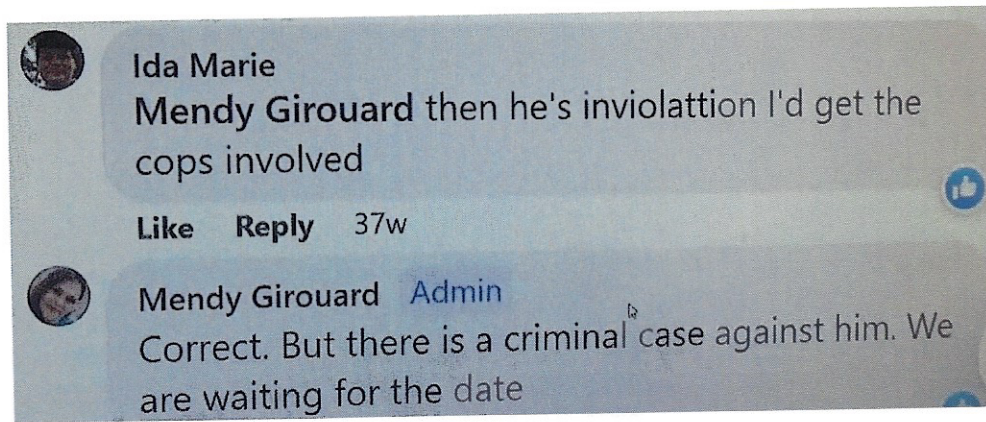
MAY IT PLEASE THE COURT:

Plaintiff, **BILLY BROUSSARD**, in proper person, submits this Memorandum to Compel Discovery for the following reasons:

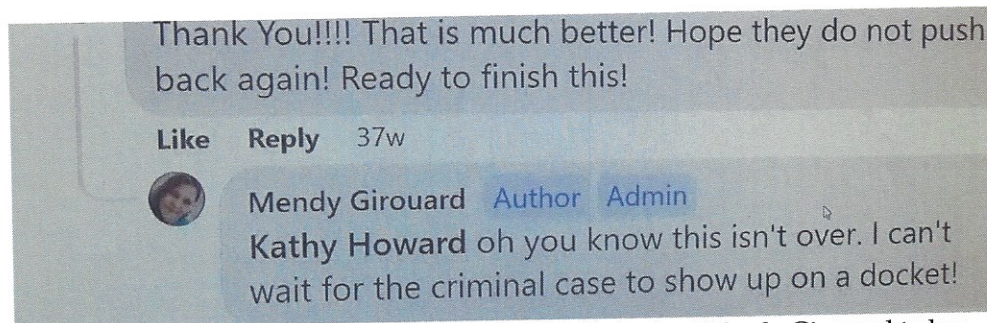
As the old saying goes, a picture is worth a thousand words. Hence, several pictures are worth several thousand words. Accordingly, Plaintiff submits the following Facebook posts made to the group "**Vieux Jacquet Neighborhood**" managed by **Defendant Mendy Girouard**, all of which have recently come into Plaintiff's possession as a result of good Samaritans residing in the neighborhood who have viewed with great disdain the postings of Defendant Mendy Girouard and her core group of 8-10 other residents who have persistently published defamatory posts regarding Plaintiff:



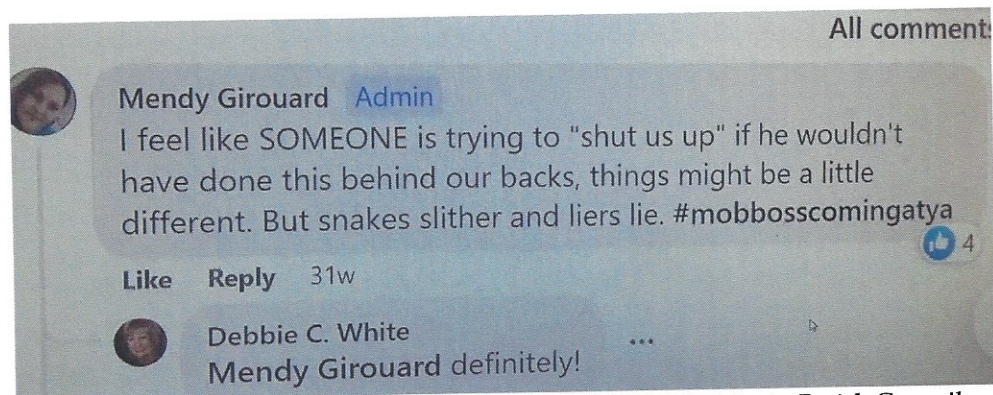
Facebook post of January 14, 2022 published by Defendant Mendy Girouard to her Facebook group (in response to Ms. Ida Broussard) not only demonstrating absolutely profound ignorance in stating that Plaintiff is violating a TRO (Defendant Girouard made the same verbal claim on January 6, 2022 at the St. Martin Parish Planning and Zoning meeting) which dissolved by operation of law on or around September 22, 2022 but further falsely states that that Plaintiff is, "just doing what he wants."



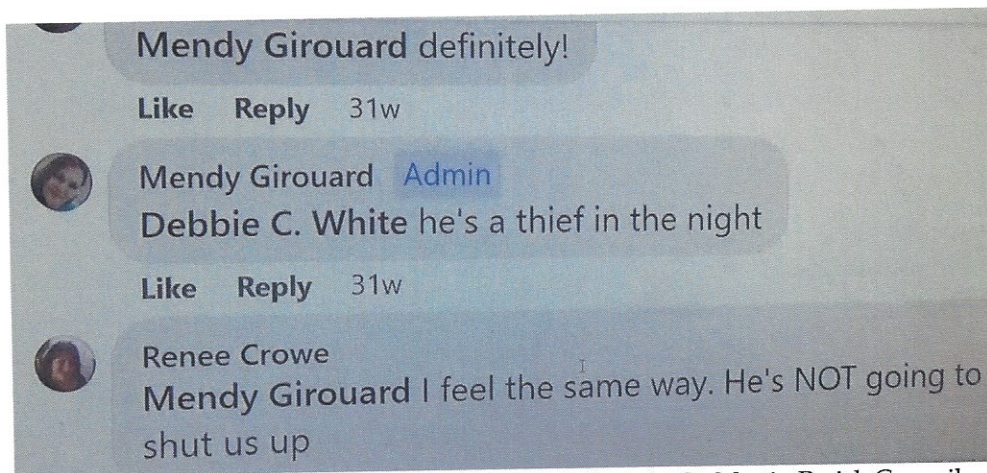
Facebook post of January 14, 2022 published by Defendant Mendy Girouard to her Facebook group (in response to Ms. Ida Marie) falsely indicating that there is a "criminal case against him (Plaintiff)," and that, "We are waiting for the date."



Facebook post of January 14, 2022 published by Defendant Mendy Girouard to her Facebook group (in response to Ms. Kathy Howard) falsely indicating that Plaintiff is subject to a "criminal case" and how she, "can't wait for the criminal case to show up on a docket."



Facebook post of February 28, 2022 (two days before the St. Martin Parish Council Meeting) published by Defendant Mendy Girouard to her Facebook group blatantly defaming Plaintiff in referencing him as among "snakes" which "slither" and among "liars" (sic) who "lie," and further bragging upon her self-proclaimed status as "Mob Boss" by openly promoting her hashtag "#mobboscomingatya."

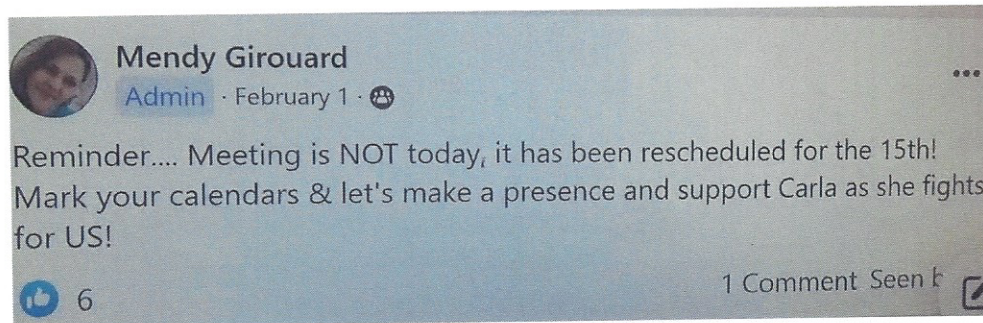


Facebook post of February 28, 2022 (two days before the St. Martin Parish Council Meeting and in response to Ms. Debbie C. White) published by Defendant Mendy Girouard to her Facebook group blatantly defaming Plaintiff in referencing him as a, "thief in the night."

The preceding five (5) Facebook postings are but a tiny fraction of all of the blatantly-defamatory posts which have been represented to Plaintiff as having been published on Defendant Girouard's Facebook Group from the time of Defendant Mendy Girouard and Defendant Melissa Dubroc launching their crusades against Plaintiff in late 2021. In fact, the concerned resident supplying these Facebook posts to Plaintiff indicated that it would require "quite a while" for anyone to screen-save the "massive" number of such posts which the individual described as being "disgusting" and something the individual simply would not and could not, "in good conscience," stand by and let transpire.

Not only were these defamatory publications made to the approximate 90 neighbors who were mere bystanders of this group (some of whom have confided to Plaintiff that they remained members of the group merely to observe the incredible propensity for Defendant Girouard to portray herself as a cult leader in frequently addressing the entire Membership with the opening line of "My people....," as if she were in the Biblical days of Moses), but they were also seen by one of the St. Martin Parish Council Members, Carla Jean-Baptiste (a member of the Facebook group since October of 2020), who represents the neighborhood on the Council and who would vote on Plaintiff's matter on March 2, 2022 and whose vote was most likely influenced by this

small group of regular posters to this Facebook group. In fact, here's yet another post entailing Girouard's close working relationship with Councilwoman Carla Jean-Baptiste:



Defendant Mendy Girouard posts on February 1, 2022 that the neighborhood should, "support Carla as she fights for us."

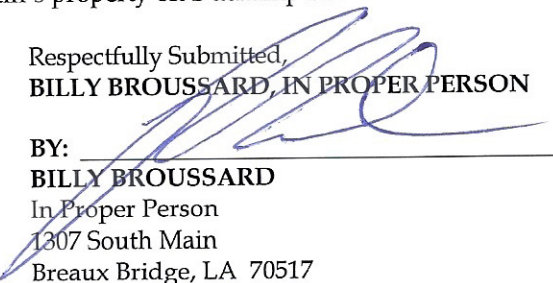
Extensive other posts have been reportedly made by Defendant Girouard elaborating upon the collaboration between "Carla" and herself to include Girouard stating that "a community meeting" needs to transpire before the matter is placed on the Planning and Zoning meeting, Defendant Girouard personally handing "Carla" material (also purported to have been provided to Louisiana State Trooper Scott Lopez) which, upon information and belief, is also blatantly defamatory.

For that reason, Defense Counsel's contention that the Request for Production of the Facebook postings is, "irrelevant and not likely to lead to admissible evidence in regards to Plaintiff's claims of defamation and/or slander" is clearly misguided. Further, Defense Counsel's response to Plaintiff's Request for Production indicates that either: #1) he has not viewed the Facebook posts (which would seem ill-advised on his part), or #2) he has seen the Facebook posts and nevertheless falsely asserts what he has asserted.

In summation, as is painfully obvious, the Facebook posts constitute a critical element of Plaintiff proving his case for Defamation and, accordingly, Plaintiff respectfully Moves this Honorable Court to GRANT his Motion to Compel Discovery on the Facebook posts, which are clearly in violation of Facebook's published Community Guidelines and are obviously in direct violation of Defendant Girouard's own Facebook rule calling for "kindness," and further instruct Defendant Girouard to tender all of the

Facebook posts on her Facebook Group, "Vieux Jacquet Neighborhood" which in any way reference Plaintiff or Plaintiff's property on Duchamp Road.

Respectfully Submitted,
BILLY BROUSSARD, IN PROPER PERSON

BY: 
BILLY BROUSSARD
In Proper Person
1307 South Main
Breaux Bridge, LA 70517
Billy@BillyBroussard.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has this day been forwarded to all known counsel of record by:

- ☐ United States mail, properly addressed and postage prepaid.
- ☐ Registered United States mail, return receipt requested, properly addressed and postage prepaid.
- ☐ Facsimile transmission.
- ☐ Hand Delivery.
- ☒ E-mail Transmission.

Breaux Bridge, Louisiana, this 21st day of November 2022.

BILLY BROUSSARD
In Proper Person
1307 South Main
Breaux Bridge, LA 70517

BY: 
BILLY BROUSSARD

RECEIVED AND FILED

2022 NOV 21 AM 11:33

DEPUTY CLERK OF COURT
ST. MARTIN PARISH

BILLY BROUSSARD

* 16TH JUDICIAL DISTRICT COURT

VERSUS NO. 92077 "F"

* PARISH OF ST. MARTIN

MENDY GIROUARD AND
MELISSA DUBROC

* STATE OF LOUISIANA

RULE 10.1 CERTIFICATE

I, **BILLY BROUSSARD**, certify that pursuant to Rule 10.1 of the Uniform Rules of Civil District Courts, I scheduled a Rule 10.1 telephone conference for November 22, 2022 with Mr. Eric Timothy Haik, Defense Counsel for Defendant Mendy Girouard for the purpose of amicably resolving the issues presented in Plaintiff's Motion to Compel.

Notwithstanding the foregoing and, as reflected in the email chain of November 18, 2022 submitted with Plaintiff's Motion to Compel, Defendant, MENDY GIROUARD, has failed and/ or refused to respond to said discovery requests although numerous attempts have been made to obtain same.

SIGNED in St. Martin Parish, Louisiana, on this 21st day of November, 2022.

BILLY BROUSSARD, IN PROPER PERSON



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DEPUTY CLERK OF COURT
ST. MARTIN PARISH

BILLY BROUSSARD

*

16TH JUDICIAL DISTRICT COURT

VERSUS NO. 92077 "F"

*

PARISH OF ST. MARTIN

MENDY GIROUARD AND
MELISSA DUBROC

*

STATE OF LOUISIANA

ORDER

Considering the foregoing;

IT IS ORDERED that the Motion to Compel Discovery filed by Plaintiff, **BILLY BROUSSARD** and against Defendant, **MENDY GIROUARD**, be fixed for hearing according to the rules and practices of this Honorable Court on the ____ day of _____, 202_ at ____ o'clock __.m. in St. Martin Parish, Louisiana.

THUS DONE AND SIGNED on this ____ day of _____, 2022,
at St. Martinville, St. Martin Parish, Louisiana.

DISTRICT JUDGE

Please Serve:

Defendant Mendy Girouard, through her Counsel of Record:

ERIC T. HAIK
1017 E. Dale Street
New Iberia, LA 70562-1040
Attorney for Defendant

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