

BILLY BROUSSARD

NUMBER 91706 DOCKET: D

16TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF ST MARTIN

SCOTT MICHAEL LOPEZ,
BENJAMIN COLE LOPEZ

STATE OF LOUISIANA

PLAINTIFF’S MEMORANDUM IN OPPOSITION TO MOTION TO COMPEL

Now unto Court comes Plaintiff, Billy Broussard, in proper person, who files this Memorandum in Opposition to Defendants’ Motion to Compel scheduled to be argued before this Honorable Court on February 2, 2023 at 9:00 a.m.

Defendants served a plethora of Discovery Requests upon Plaintiff on or around July 12, 2022, and Plaintiff has worked diligently on responding to all of those Discovery Requests. On or around October 13, 2022, Plaintiff submitted to Defendants extensive responses which went well above and beyond what Plaintiff was legally required to submit to Defendants. Those extensive responses are attached hereto and made a part hereof as Exhibit “A.”

Despite Plaintiff’s extensive efforts to comply with Defendants’ Discovery Requests, Defendants continued to assert that they are entitled to financial documents which stretch beyond the dates that even the IRS is entitled to audit and for which Plaintiff is required to maintain!

In an abundance of cooperation and attempts to appease Defendants, Plaintiff provided the name of his CPA. Defendants are presently attempting to serve a subpoena upon Plaintiff’s CPA for the records sought, and Defendants have indicated via email that, with that subpoena and associated deposition of Plaintiff’s CPA scheduled for Monday, February 13, 2023, the matter of Plaintiff’s financial records for purposes of this Motion to Compel should be considered “moot,” and Plaintiff has indicated to Defendants a willingness to do just that.

Plaintiff will state, however, that Defendants’ ultimate goal unquestionably appears to be the filing of a Motion for Summary Judgment with intent to show Plaintiff incurred no financial damages as a result of Defendants’ defamatory acts.

Absent the outsized influence of Defendant Scott Lopez, who literally took over the St. Martin Parish Planning and Zoning Meeting of January 6, 2022, and who uttered

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repeated falsehoods about Plaintiff at that meeting, all of which are clearly captured on videotape, Plaintiff's request for Zoning Variance, which Plaintiff contends was not even required for Plaintiff to engage in the activities in which he was engaging, would have almost certainly have been approved as a matter of routine practice. St. Martin Parish officials, most notably then-Chief Administrator Calder "Pop" Hebert indicated as much to Plaintiff on or around September 15, 2021.

Given Defendant Scott Lopez's blatantly defamatory and malicious statements about Plaintiff to even go so far as to include Plaintiff's father (direct neighbor to Defendant Scott Lopez), the Committee voted to deny Plaintiff's Variance application.

As a result of that vote, largely influenced by Defendants' blatantly defamatory statements, and the resulting confirmation by the full St. Martin Parish Council, a likely-illegal Temporary Restraining Order was issued against Plaintiff on or around March 6, 2022. Absent those votes, which were heavily impacted by the defamatory, false, and malicious statements by Defendant Scott Lopez, that Restraining Order would simply not have been issued and Plaintiff could have continued his activities unabated.

The Restraining Order and the ensuing Preliminary Injunction, all of which were heavily influenced by Defendants' blatantly defamatory and malicious statements made about Plaintiff at the January 6, 2022 St. Martin Parish Planning and Zoning meeting, have resulted in Plaintiff having to increase his bids on jobs from the effective date of the likely-illegal Restraining Order through the present date. Plaintiff submits an itemization of the jobs entailing bids lost as a result of the necessity of having to increase those bids to offset the higher haul off costs associated with the bids, all of which resulted in Plaintiff not obtaining the jobs associated with those bids.

That itemization of jobs lost and the incorporated gross profit margin of those lost jobs (at a rate of 65 percent, which is Plaintiff's historical average profitability on jobs he obtains) is attached hereto and made a part hereof as Exhibit "B." The final itemization of damages incurred through October 22, 2022 totals \$443,975 in lost jobs, with the profitability thereof totaling \$287,163.75.

Upon Plaintiff's CPA being able to provide Defendants Scott Lopez and Benjamin Lopez with the 2022 profit and loss statement as they seek along with the same statement for 2021, Defendants will be taken aback as they see first-hand the devastating

adverse financial impact their blatantly false, defamatory, and malicious statements about Plaintiff had on his livelihood in 2022 vis-à-vis 2021, a year in which Plaintiff suffered no financial impact whatsoever because St. Martin Parish President Chester Cedars permitted the 2021 Restraining Order to dissolve in fourteen days. Cedars further indicated that he merely wanted Plaintiff to go through the “process” of obtaining a Zoning Variance, which Plaintiff’s then-counsel, Michael Adley, emphatically indicated was in no way required because Plaintiff’s offloads of vegetative materials were all transpiring more than 500 feet from the road. Prior court testimony by St. Martin Parish Government attorney Allan “Sprinky” Durand has indicated that St. Martin Parish Government has zoning only for distances up to 500 feet from the road, and Durand further indicated that, beyond 500 feet from a road, there, “is no zoning.”

At any rate, in an attempt to appease Parish officials, most notably Parish President Chester Cedars, Plaintiff agreed to go through the “process” as a mere courtesy and, as Plaintiff’s then-attorney, Michal Adley, indicated, “an attempt at compromise.” Further, on the very day after the 2021 Temporary Restraining Order was permitted to dissolve (i.e. on or around September 15, 2021), then-St. Martin Parish Administrator Calder “Pop” Hebert, told Plaintiff and his then-attorney, Michal Adley, that, “We may have some token opposition, but we will be able to handle that.” Further, St. Martin Parish President, Chester Cedars, in an apparent belief that Plaintiff and he had essentially concluded the entire matter by Plaintiff merely going through the “process,” visited with Plaintiff and his then-attorney, Michael Adley, on that same date, on or around September 15, 2021, at which time Cedars stated to Plaintiff, “Mr. Broussard, I’m really glad we were able to get this situation worked out.”

Unfortunately, Defendants Scott Lopez and Benjamin Lopez badly tainted that “process” which Plaintiff agreed to embark upon as a courtesy to Parish officials when, on January 6, 2022, they made their false, malicious, and blatantly defamatory statements about Plaintiff at the St. Martin Parish Planning and Zoning Committee meeting of that same date.

Thus, Plaintiff has instructed his CPA to provide Defendants with the 2022 profit and loss statement at the earliest possible date because Defendants are going to rue the day they ever asked for those statements, and Plaintiff is eager for them to be prepared by

his CPA and provided to Defendants to demonstrate unequivocally the drastic impact their actions have inflicted upon Plaintiff.

With the financial statements aspect of the Motion to Compel mutually being considered “moot” by both Plaintiff and Defendants, Plaintiff now moves on to the one remaining item which forms the basis of Defendants’ Motion to Compel before this Honorable Court.

That item calls for an itemization of Plaintiff’s trucks in terms of registration forms to include color. Defendants claim they need that material in order to rule out the possibility that Plaintiff owns a “purple truck.” Defendants are unwilling to accept Plaintiff’s attestation to the fact that he owns no “purple truck.”

The importance of the “purple truck” is that Defendant Scott Lopez, among the many other falsehoods he uttered at the St. Martin Planning and Zoning meeting on January 6, 2022, stated that Plaintiff had permitted other tree service companies to haul in vegetative materials and had charged them for doing so. His statement was blatantly false and, when called upon by St. Martin Parish Government attorney Allan “Sprinky” Durand to back up his statement, Defendant Scott Lopez emphasized, with a camera rolling and capturing his every word, the fact that he had a picture of a “purple truck” which he falsely portrayed that Plaintiff had permitted to offload materials, and further falsely stated that Plaintiff had charged the owner of the truck to offload those vegetative materials.

Regarding the Motion to Compel as it pertains to Plaintiff’s trucks, Defendants’ counsel and Plaintiff engaged in email correspondence on the dates of December 22, 2022 and December 23, 2022. That email correspondence is attached hereto and made a part hereof as Exhibit “C.”

While not producing the entirety of the exchange within this Memorandum, the bottom line is that the purple truck in question has been identified by Defendant Scott Lopez himself! He is the one who stood in front of the Planning and Zoning Committee (and about 50 audience members) and boldly stuck his chest out and boasted that he had a picture of the “purple truck” which he asserted (blatantly falsely) that had been permitted to haul in vegetative materials and that, further (also blatantly falsely) stated that Plaintiff had charged the owner of the truck to offload the vegetative materials.

As Exhibit "C" plainly states, Plaintiff informed Defendants that, unless Defendant Scott Lopez was willing to assert that he had falsely portrayed to the St. Martin Parish Planning and Zoning Committee that what he said about that "purple truck," was false, the issue of Plaintiff's list of vehicles is irrelevant and moot.

That is the case because Defendant Scott Lopez has never one time challenged that the truck he (falsely) represented to the Committee was in fact the "purple truck" which he himself provided a photo of to St. Martin Parish Planning and Zoning officials, namely former Chief Administrator Calder "Pop" Hebert via text (along with many other such texts to Hebert which will most certainly be introduced as evidence at trial). Never!

To further demonstrate the lack of relevance of the request for Plaintiff's list of vehicles, Plaintiff submits, as Exhibit "D," which is attached hereto and made a part hereof, a compact disk copy of an audio phone call between Plaintiff and the owner of the infamous "purple truck," Arthur Trahan. That phone call transpired on or around May 2, 2022 and, as plainly stated in the email correspondence, Trahan made the following statements on that audio recording which has been supplied to this Honorable Court as Exhibit "D.":

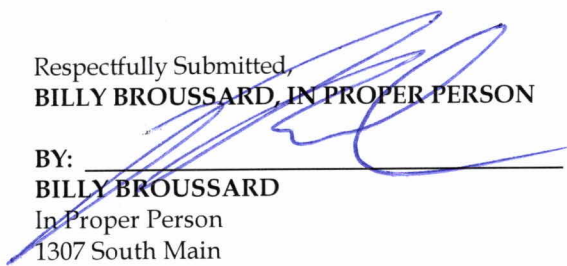
- 1) He's never gone on Plaintiff's property,
- 2) He almost never hauls vegetative materials but mainly hauls materials for construction,
- 3) That he has made deliveries to Plaintiff's Laotian neighbors (about whom Plaintiff is in possession of fellow Defendant (Docket #92077-C) Melissa Dubroc's family uttering threats against those same neighbors),
- 4) That he knows (Defendant) Mr. Lopez "real good," (sic)
- 5) That he (Trahan) also is related to Mr. Lopez's one-time supervisor, John Trahan,
- 6) That Lopez's neighbors have blocked off Duchamp Road and told him, "Cuz, you can't pass,"
- 7) That he responded to Duchamp Road being blocked off with, "You better unblock this road. They got people on this road trying to haul materials."

Plaintiff further provides with this Memorandum in Opposition to Motion to Compel as being included as part of Exhibit "C," (the email correspondence between Plaintiff and

Defendants' Counsel) actual photos of Arthur Trahan's purple truck which were provided to Defendants' Counsel as attachments to the email correspondence (Exhibit "C").

For the foregoing reasons, Plaintiff respectfully requests that this Honorable Court issue a ruling that the Motion to Compel as it pertains to Plaintiff's financial records be rendered moot as both sides have agreed to that characterization and, further, that this Honorable Court issue a ruling that the Motion to Compel the listing of Plaintiff's trucks be DENIED for the aforementioned reasons. Plaintiff further prays that all costs associated with this matter be assessed against Defendants.

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 23rd day of January, 2023.

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

BY: 
BILLY BROUSSARD

BILLY BROUSSARD * 16TH JUDICIAL DISTRICT COURT
VERSUS NO. 91706-H * PARISH OF ST. MARTIN
SCOTT MICHAEL LOPEZ, ET AL * STATE OF LOUISIANA

PLAINTIFF'S RESPONSES to DEFENDANTS' FIRST SET OF REQUEST FOR ADMISSIONS

REQUEST FOR ADMISSIONS NO. 1:

Please admit that Billy Broussard, Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC, are the owners of an approximately 33-acre tract of land located at the address of 1675 Duchamp Road, Broussard, Louisiana, 70518.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 1:

As reflected in the public records on file with the St. Martin Parish Clerk of Court, Billy Broussard Farm and Land Development, LLC is the owner of the land located at 1675 Duchamp Road, Broussard, Louisiana, 70518

REQUEST FOR ADMISSION NO. 2:

Please admit or deny that Billy Broussard, Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC is the owner/operator of a tree cutting, tree trimming, and tree cultivation business.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 2:

Billy Broussard owns a company that provides tree services.

REQUEST FOR ADMISSION NO. 3:

Please admit or deny that the property located at 1675 Duchamp Road, Broussard, Louisiana, 70518 was improperly being used as a dumpsite for discarded trees, tree logs, branches, vegetation, and other commercial activity.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 3:

Deny.

REQUEST FOR ADMISSION NO. 4:

Please admit or deny that 1675 Duchamp Road, Broussard, Louisiana, 70518 is located in a residential area that is zoned for residential activity by St. Martin Parish.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 4:

Deny based upon the fact that Plaintiff has 33 acres that goes well beyond 500 ft of the road upon which all vegetative materials were legally and lawfully offloaded, the fact that St. Martin Parish Government has failed to properly record zoning maps with the St. Martin Parish Clerk of Court, and the fact that Allan "Sprinky" Durand testified under oath that St. Martin Parish has "no zoning beyond 500 feet from the road." (See SMPG v. Champagne Boat Tours, which was appealed by SMPG and upheld with Durand's testimony critical to the case's outcome).

Exhibit "A"

REQUEST FOR ADMISSION NO. 5:

Please admit or deny that St. Martin Parish Government sent a cease-and-desist letter to Plaintiff on or about July 21, 2021 for failure to comply in a continued violation of residential zoning ordinances.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 5:

The cease-and-desist letter is dated JUNE 21, 2021 and serves as the best evidence of its contents. Plaintiff flatly denies any and all alleged violations of any zoning ordinances (see Request for Admission # 4).

REQUEST FOR ADMISSION NO. 6:

Please admit or deny that St. Martin Parish Government, a Political Subdivision of the State of Louisiana, filed the attached (Exhibit B) Petition for Temporary Restraining Order, Preliminary and Permanent Injunctive Relief, bearing Docket No. 90830, in the records of St. Martin Parish, Louisiana, wherein it was asserted that Plaintiffs property located at 1675 Duchamp Road, Broussard, Louisiana, 70518 was being used as a commercial dump site wherein it alleged that Plaintiff herein was hauling and unloading discarded trees, limbs and other vegetation.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 6:

Admit subject to the following added material pertinent therein:

St. Martin Parish Government agreed in writing on or about September 14, 2021 for Plaintiff to resume all activities because Parish President Chester Cedars realized, upon reading Plaintiff's then-attorney, Michael Adley's Pretrial Memorandum, that:

A. SMPG failed to keep a copy of its zoning maps on file with the St. Martin Parish Clerk of Court, thus rendering any zoning ordinances unenforceable. Adley further asserted that Cedars has been aware of and acknowledged this "fatal flaw" since as far back as 2012

B. Prior sworn testimony by Parish Attorney Allan "Sprinky" Durand in which he point-blank stated under oath that, beyond 500 feet from the road, the Parish, "has no zoning." Petitioner's vegetative materials, which Petitioner uses to gradually fill several very deep canyons on his property, are all located far more than 500 feet from the road.

C. A Parish Ordinance which Cedars sought approval for and obtained passage of by the Council and which was immediately deployed days after it passed on August 3, 2021 to support and, in Cedars' mind, fully authorize the filing of the Parish's Temporary Restraining Order against Petitioner, violated the "Dormant Commerce Clause," was written, "to specifically target Petitioner," and was, "far too vague" to survive a Constitutionality challenge.

Defendant Trooper Scott Lopez either knew, or certainly should have known, about the above material because it was published on *Sound Off Louisiana*, and Defendant Trooper Scott Lopez routinely texted links for those features to St. Martin Parish Director of Administration Calder "Pop" Hebert. If he (Defendant LSP Trooper Scott Lopez) failed to even read the material in what he texted, shame on him, and perhaps it is just those sort of little details that Hebert found inconvenient to the cause of his boss, Chester Cedars, which prompted him to reply to the text in which Adley's pre-trial memorandum was both linked and placed within the body of the *Sound Off Louisiana* feature, that the feature had, "not much substance given its length." At any rate, ignorance is no excuse! Defendant Scott Lopez has admitted to and in fact bragged of the fact he had been diligently, "working with Parish officials" and having stated to Plaintiff on June 14, 2021 that, based upon that joint collaboration with Parish officials, HE (Lopez) would soon, "have the authority to shut you down," (with a voice inflection demonstrating extreme malice similarly to what Plaintiff's driver said was present when he uttered, "You better not go down my road again if you know what's good for you,") and the fact that Lopez bothered not one iota to read the court filings directly available to him and published on *Sound Off Louisiana* on September 6, 2021 (his texts of such features to Hebert notwithstanding), he would have known those facts. Instead, he either opted to stay blissfully ignorant of those facts and proceed with the blatantly defamatory commentary he made on January 6, 2022, or else he was fully cognizant of those court filings and chose to engage in his blatantly false and defamatory commentary anyway without bothering with mentioning that "Parish officials," to include Parish President Chester Cedars, would have to be fully complicit in the "illegal acts" he referenced that Plaintiff committed! Perhaps Defendant Trooper Lopez may wish to re-

evaluate the degree to which he may desire to, "work with Parish officials" in the future and/or to educate himself better about facts of ongoing litigation as well as evaluate the trustworthiness of those Parish officials before he appears in front of a crowd of 50+ people and makes statements resulting in his employer, Louisiana State Police, citing him for "Conduct Unbecoming a Louisiana State Police Trooper," and forming much of the basis for this litigation because of the blatantly defamatory statements he made at that videotaped meeting.

REQUEST FOR ADMISSION NO. 7:

Please admit or deny that on or about August 3, 2021, at a regular meeting of the St. Martin Parish Council, Summary No. 1329-0R was introduced by Councilwoman Carla Jeanbaptiste which was an Ordinance to amend Article 1 of Chapter 26 of the Code of Ordinances for St. Martin Parish, Louisiana, by the enactment of Section 26-10, all relative to the prohibition of dumping and/or burning of specific substances and providing for penalties or a violation thereof.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 7:

See response to Request for Admission # 6 and more particularly Adley's statements about the constitutionality of the Ordinance. Attorney General Jeff Landry is supposed to render a ruling on that constitutionality (or much more likely the lack thereof) when Plaintiff opts to schedule the Permanent Injunction hearing.

REQUEST FOR ADMISSION NO. 8:

Please admit or deny that it was alleged by St. Martin Parish Government that Plaintiff was operating a business commercial in nature in an area zoned strictly for residential and in violation of Section 26-10 of the St. Martin Parish Code of Ordinances.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 8:

See previous responses to Requests for Admission # 6 and # 7 above.

REQUEST FOR ADMISSION NO. 9:

Please admit or deny that as a result of your commercial activities on the subject property, the neighborhood located at or around subject property voluntarily set up a Vieux Jacquet Neighborhood Group Facebook page wherein they rallied a group of concerned neighbors for a neighborhood meeting to take place on December 16, 2021 at 1055 Vieux Jacquet Road (Elmo & Sue's house) (See flyer attached as Exhibit C).

RESPONSE TO REQUEST FOR ADMISSIONS NO. 9:

As Plaintiff was not invited to the meeting nor informed of the motivation for any Facebook page, Plaintiff cannot speak as to the reasons for its formation nor the meeting referenced above. Here are the names and contact information of individuals, all of whom are asserted to be members and/or managers of that Facebook page, and all of whom attended the meeting for those inquiries to be more appropriately directed:

1. Mendy "Mob Boss" Girouard, Facebook group founder and moderator, 1057 Vieux Jacquet Road, Broussard, Louisiana, 70518. Telephone: 337-636-0726.
2. Joelle Dubroc "It's only battery to cross the street and beat the f@@@ out of her, right?" Lamperez, Facebook group co-moderator, 1665 Duchamp Road, Broussard, Louisiana, 70582. Telephone: 337-339-4035.
3. Councilwoman Carla Jeanbaptiste, Facebook group member, 1084 Alexander Circle, St. Martinville, Louisiana 70582. Cell #337-344-8513.

REQUEST FOR ADMISSION NO. 10:

Please admit or deny that members of the general public can attend all regularly scheduled planning and zoning meetings.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 10:

Admit.

REQUEST FOR ADMISSION NO. 11:

Please admit or deny that Defendants, **SCOTT MICHAEL LOPEZ** and **BENJAMIN COLE LOPEZ** were not the only concerned citizens who appeared at the January 6, 2022 St. Martin Parish Planning and Zoning meeting in which the activities on your property were brought before the board.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 11:

Admit, with the added statement that Defendant Trooper Scott Lopez literally took over the entire running of the meeting. He began making prolonged falsehood statements about me, then HE (not the Chairman of the Committee) started calling up other individuals present to include his son, Defendant Benjamin Cole Lopez, and Ms. Kathy Howard, who readily stated that she did NOT wish to speak, but Defendant Scott Lopez insisted that she speak anyway indicating that she would be able to, "nip it in the hip." While the "leadership" of that Commission (if one can claim there was any "leadership" whatsoever as the meeting, which has been described as, "one step above an episode of Jerry Springer,") certainly should have reined Defendant LSP Trooper Scott Lopez in, his actions indicate the degree to which he has dominated the leadership of the "crusade" of "harassment" against Plaintiff (Michael Adley's words) and further demonstrated his extreme malice toward both Plaintiff and his father at that meeting. In fact, Plaintiff is not even sure Defendant LSP Trooper Scott Lopez ever indicated a willingness to concede the title of "Mob Boss" to Mendy Girouard, and Plaintiff does not know whether or not any election of Facebook group members and other "concerned" citizens not in the Facebook group was even taken to declare her the winner of that title. What Plaintiff does know is that Mendy Girouard tried to keep her defamatory commentary about Plaintiff out of the public view, whereas Defendant LSP Trooper Scott Lopez went out of his way to stick his chest out and proudly lay claim to his defamatory statements, including manufacturing up a complete falsehood about a "purple truck" being on Plaintiff's property and being charged to offload materials, and passing to the Commission members a picture of that "purple truck." Further, upon information and belief, Trooper Lopez provided a log of dates and times that Plaintiff hauled in materials which he stated, "This is only for his (Plaintiff's) activities from July 29, 2021 on." Upon information and belief, he chose that date specifically because he knew from reading *Sound Off Louisiana* posts (which he texted to SMPG Administration Commissioner Calder "Pop" Hebert, who is a former law-enforcement officer himself also) that founder Robert Burns was in possession of his timesheets and therefore records of logs prior to that date had to be excluded because they would demonstrate that Defendant LSP Trooper Scott Lopez was engaging in his activities while on LSP's payroll rather than working his LSP job for which he was being paid. Further, ALL of the dates supplied for which he accused Plaintiff of "illegal acts" (emphasis on ALL) were either: #1) before the TRO was signed, or #2) after the written agreement between Plaintiff and Parish President Chester Cedars went into effect on September 14, 2021. A-L-L!!!!!!!

REQUEST FOR ADMISSION NO. 12:

Please admit or deny that numerous members of the community inclusive of **SCOTT MICHAEL LOPEZ** and **BENJAMIN COLE LOPEZ**, testified in opposition to the use of your property for commercial purposes at said planning and zoning meeting.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 12:

Deny. The only other individuals who specifically spoke (Plaintiff objects to the word "testify" but stresses that speakers are nevertheless expected to tell the truth) against the variance to Plaintiff's memory were Mendy Girouard (who refrained from making public defamatory statements but unleashed a ton of them on body cam video on or around May 4, 2022 and who, upon information and belief, has done similarly on her Facebook group which will be pursued during discovery) and Keith Landry (though the "Chairman" had to ask Landry whether he was for or against because his statements – again, Plaintiff objects to the word "testify" because nobody is under oath but nevertheless expected to tell the truth which Defendant Trooper Scott Lopez flatly did not on numerous occasions most especially the "purple truck" – made it impossible to discern whether he was in fact for or against). Kathy Howard was also practically dragged out of her seat to testify (or as Defendant Scott Lopez characterized her soon-to-be

statements as, "nip it in the hip"); however, her public commentary about Plaintiff was actually quite complimentary. Additionally, Kathy Howard stated to Plaintiff privately after the meeting that, the sentiments of the crowd notwithstanding, she promised to keep an eye out on Plaintiff's machinery as she felt the potential for theft and/or vandalism was high.

REQUEST FOR ADMISSION NO. 13:

Please admit or deny that Defendants, **SCOTT MICHAEL LOPEZ** and **BENJAMIN COLE LOPEZ** have a right to testify regarding any issue at a public hearing if they have an issue with your use of your property.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 13:

We have the freedom of speech; however, as Plaintiff is not a public figure, that freedom stops where Plaintiff's rights not to be defamed begin, and Plaintiff has a RIGHT not to be defamed by blatantly false statements such as those made by LSP Trooper Scott Lopez entailing the "purple truck." Defendant Trooper Scott Lopez dominated discussion that night, and he was also first, and there is no question that first impressions (made to Commission Members) are lasting. Further, Defendant Scott Lopez portrayed himself to be an expert on subject matter about which he subsequently demonstrated no knowledge of whatsoever, and Plaintiff looks forward calling him as a witness at trial and, during direct examination, expose Defendant Scott Lopez's lack of subject matter knowledge on those areas on which he purported to have such extensive knowledge.

REQUEST FOR ADMISSION NO. 14:

Please admit or deny that you have not filed suit for defamation or slander against any other member (except named Defendants herein) of the community that testified at the planning and zoning hearing that you were conducting unlawful commercial activities on subject property.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 14:

Deny. I sued Mendy Girouard and Melissa Dubroc (Docket # 92077) on September 20, 2022 and both were served with the suit on September 29, 2022.

REQUEST FOR ADMISSION NO. 15:

Please admit or deny that you have authorized other persons or entities to dump debris on subject property during your ownership.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 15:

Only Judge Anthony Thibodeaux and, as he testified to under oath on May 3, 2022, Plaintiff did not charge him "a dime" for any such offloading; furthermore, he testified under oath that it created a "hardship" for him when he lost access to Plaintiff's property. He further testified that he was forced to take his loads to a direct competitor, Possum's Tree Service which, on August 3, 2021, Parish President Chester Cedars said was, "all for this Ordinance, by the way. You know why? Because it places everyone on a level playing field. This man in the tree service business told me it cost him \$70,000 to get his property built up to haul in debris." Upon information and belief, Parish President Cedars has improperly colluded with a direct competitor of Petitioner with the sole intent of driving Petitioner out of business by way of enormous legal fees to defend against an unconstitutional ordinance, and Plaintiff contends that Defendant LSP Trooper Scott Lopez (though he could not even state the name of the "document" Cedars was "working on drafting" when he referenced it to Plaintiff on June 14, 2021) has aided and abetted Cedars in his efforts, even going so far as to brag on June 14, 2021 to Plaintiff that he was, "working with Parish officials on some sort of document which, if enacted, will enable ME (Lopez) to shut down your ability to haul materials to your property." Plaintiff believes that the malice with which Defendant Lopez uttered that statement was a direct result of Plaintiff having the nerve to call Defendant Lopez's direct supervisor within minutes of his encounter with Plaintiff's driver on June 14, 2021.

REQUEST FOR ADMISSION NO. 16:

Please admit or deny that the St. Martin Parish Government petitioned for a temporary restraining order, preliminary and permanent injunctive relief and that the request for preliminary injunction was granted by Judgment of the Court as referred in attached Exhibit A.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 16:

Please see the responses to Requests for Admission # 6 and # 7.

REQUEST FOR ADMISSION NO. 17:

Please admit or deny that the Honorable Judge Suzanne deMahy further ordered that Billy Broussard, Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC were enjoined and prohibited from hauling, transporting, abandoning and storing discarded trees, logs, branches and other tree vegetation in violation of Parish Ordinance located in Section 26-10 of the St. Martin Parish Code of Ordinances as referred in attached Exhibit A.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 17:

Please see the responses to Requests for Admission # 6 and # 7.

REQUEST FOR ADMISSION NO. 18:

Please admit or deny that the Honorable Judge Suzanne deMahy further granted and ordered that Billy Broussard, Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC were enjoined and prohibited from operating a tree service business at the property located at 1675 Duchamp Road, Broussard, Louisiana, 70518, using the property located at 1675 Duchamp Road, Broussard, Louisiana, 70518, as a dumpsite for discarded trees, logs, branches, and vegetation, and conducting any commercial activity on the property as the property was found by the Court to be zoned as follows: "From a distance of five hundred (500') feet adjacent to and parallel to the centerline of Duchamp Road upon which the land fronts of Defendant's property is zoned as (R-2) Residential" as a permanent finding, as referred in attached Exhibit A.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 18:

Please see responses to Requests for Admission # 6 and # 7.

REQUEST FOR ADMISSION NO. 19:

Please admit or deny that the Court further found that the property belonging to Billy Broussard, Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC passed the five hundred (500') feet as referenced in the above Request for Admissions No. 19 was found to be zoned as (R-2) Residential for the purposes of the preliminary injunction, as referred in attached Exhibit A.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 19:

Please see responses to Requests for Admission # 6 and # 7.

REQUEST FOR ADMISSION NO. 20:

Please admit or deny that complaints made by **BENJAMIN COLE LOPEZ** against you for alleged criminal activity were investigated by the St. Martin Parish Sheriff's Department.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 20:

Deny. As is evidenced by public records responses from the St. Martin Parish Sheriff's Office, that office has, "no records responsive" to any investigation for "simple assault" notwithstanding the fact that Defendant Scott Lopez stated numerous times on Deputy Baily Romero 's body-cam video of April 25, 2022 that Plaintiff, "damn near assaulted my son." Romero specifically stated to Plaintiff that Defendant LSP Trooper Scott Lopez, "wants you arrested for simple assault," and Romero will be called as a witness at trial to substantiate that fact. Further, Ms. Mendy Girouard stated on body-cam video of St. Martin Parish Deputy Mathiew Alexander on or around May 4, 2022 that Plaintiff committed, "aggravated assault," which is a statement she could have made only in speaking with either Defendant Scott Lopez and/or Defendant Benjamin Cole Lopez, either of whom would have engaged in blatant defamatory statements about Plaintiff in making any such claim about Plaintiff. While Plaintiff was arrested for a misdemeanor for one count of violation of LA R. S. 14:100.1 (Obstruction of Public Passage), District Attorney Duhe' almost immediately declined to prosecute that charge; furthermore, retired law enforcement officers and attorneys with whom I have consulted, and whom I anticipate calling as witnesses at trial, have described that arrest as "baseless," "trumped up," and as, "a member of one law enforcement agency (the St. Martin Parish Sheriff's Baily Romero) doing a 'favor' for another member of

another law enforcement agency (Louisiana State Police's Trooper Scott Lopez) and that such an action would have 'never' have been engaged in had the complaint Benjamin Cole Lopez's father, Scott Lopez, not been an LSP Trooper who actively sought Plaintiff's arrest." Further, Plaintiff anticipates calling a retired Louisiana State Police Trooper who will testify to the fact that St. Martin Parish Deputy Baily Romero conducted a flawed interview of Benjamin Cole Lopez on April 25, 2022 when he asked him very leading questions of Benjamin Cole Lopez, and those questions and their responses (most especially, "He could have,") are all captured on Deputy Baily Romero's body-cam video, and that video will most certainly be introduced as evidence at trial in this matter. That retired LSP Trooper will further testify that the proper procedure would have been to take the matter to the DA; however, fearing the DA would decline to sign off on an arrest warrant application, St. Martin Parish Deputy Baily Romero opted to bypass the DA's Office and instead submit the application directly to the judge assigned to hear this case, Judge Lewis Pittman. When Judge Pittman declined to approve the arrest warrant application, Deputy Romero then submitted the application to Judge deMahy who, for reasons only she can provide, opted to sign off on the arrest warrant within five (5) minutes of it being placed in front of her a little after 9 p.m. to seemingly indicate a sense of urgency in the need for my arrest. Public records requests of the St. Martin Parish Sheriff's Office have demonstrated only approximately three (3) instances in which the DA was bypassed and the arrest warrant directly submitted to the judge over the last several years, and every one of those entailed drug possession and/or possession with intent to distribute. That is the class of folk the collusion activities of Defendant Scott Lopez and St. Martin Parish Deputy Baily Romero debased Plaintiff into! In any event, Plaintiff continues to evaluate the possibility of pursuing a lawsuit against the St. Martin Parish Sheriff's Office for a blatant violation of Plaintiff's Constitutional Rights entailing that arrest made possible only by the acts of collusion on the parts of Defendants Scott Lopez and Benjamin Cole Lopez and, in particular Defendant Scott Lopez's collusion with St. Martin Parish Deputy Baily Romero to perhaps include individuals higher up on the food chain at the St. Martin Parish Sheriff's Office.

REQUEST FOR ADMISSION NO. 21:

Please admit or deny that the St. Martin Parish Sheriff's Department applied for an arrest warrant after conducting their own investigation of alleged criminal activity.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 21:

See response to Request for Admissions # 20.

REQUEST FOR ADMISSION NO. 22:

Please admit or deny that the St. Martin Parish Sheriff's Department obtained an arrest warrant from the Court which was ultimately issued for your arrest.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 22:

See response to Request for Admission # 20.

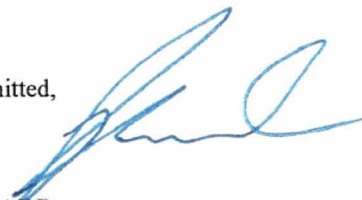
REQUEST FOR ADMISSION NO. 23:

Please admit or deny that Defendant, **SCOTT MICHAEL LOPEZ** did not issue an arrest warrant.

RESPONSE TO REQUEST FOR ADMISSIONS NO. 23:

See response to Request for Admission # 20.

Respectfully submitted,



BILLY BROUSSARD
1307 S Main
Breaux Bridge LA 70517
Tel: (337) 316-6193
Email: Billy@BillyBroussard.com

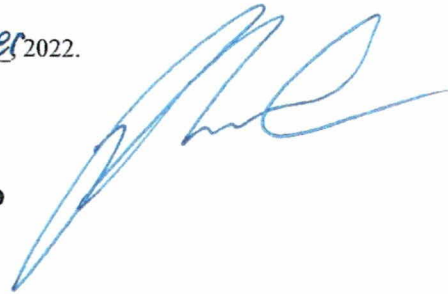
I hereby certify that a copy of the above and foregoing has this day been forwarded to all known counsel of record by:

- 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 13 day of October 2022.

BY:

BILLY BROUSSARD



BILLY BROUSSARD * 16TH JUDICIAL DISTRICT COURT

VERSUS NO. 91706-H * PARISH OF ST. MARTIN

SCOTT MICHAEL LOPEZ, ET AL * STATE OF LOUISIANA

PLAINTIFF'S RESPONSES TO DEFENDANTS' FIRST SET OF INTERROGATORIES

INTERROGATORY NO. 1:

Please state the name of the legal entity which owns and operates the subject property located at 1675 Duchamp Road, Broussard, Louisiana, 70518.

RESPONSE TO INTERROGATORY NO. 1:

As reflected in the public record, Title to the property is vested in Billy Broussard Farm and Land Development, LLC.

INTERROGATORY NO. 2:

Please state the name of any/all employees of Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC, along with names of all owners and members/managers for the last year.

RESPONSE TO INTERROGATORY NO. 2:

Billy Broussard

INTERROGATORY NO. 3:

Please list all vehicles owned and operated and used for business operations under Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC along with the year of said vehicle, make and model, inclusive of all heavy equipment used in business operations.

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff objects to this Interrogatory as it is overly broad, unduly burdensome, and irrelevant. Plaintiff further asserts that the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 4:

Please state the name and address of all persons or entities who were authorized to use the subject property located at 1675 Duchamp Road, Broussard, Louisiana, 70518 for any type of commercial activity such as dumping of trees, logs, vegetation, livestock or hay production within one (1) year of said request.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiff objects to this Interrogatory as it is overly broad, unduly burdensome, and irrelevant. Plaintiff further asserts that the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 5:

Please state the name of all persons who had access to the subject property located at

RESPONSE TO INTERROGATORY NO. 5:

Plaintiff objects to this Interrogatory as it is overly broad, unduly burdensome, and irrelevant. Plaintiff further asserts that the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 6:

Please state whether you were using subject property located at 1675 Duchamp Road, Broussard, Louisiana, 70518, for commercial activity of any kind.

RESPONSE TO INTERROGATORY NO. 6:

Plaintiff has stated on videotape at meetings of the St. Martin Parish Council that, "there is no commercial activity transpiring on this property." Please refer to *Sound Off Louisiana* feature of September 6, 2021 which Defendant Scott Lopez notified St. Martin Parish Director of Administration Calder "Pop" Hebert of on the very next day, September 7, 2021 via text, with Hebert replying to Defendant Lopez's text with, "Wasn't much content for the length of production."

INTERROGATORY NO. 7:

Please state whether an officer with the St. Martin Parish Sheriff's Department served you with an arrest warrant as a result of a criminal investigation involving Defendant, **BENJAMIN COLE LOPEZ**.

RESPONSE TO INTERROGATORY NO. 7:

As is evidenced by public records responses from the St. Martin Parish Sheriff's Office, that office has, "no records responsive" to any investigation for "simple assault" notwithstanding the fact that Defendant Scott Lopez stated numerous times on Deputy Baily Romero's body-cam video of April 25, 2022 that Plaintiff, "damn near assaulted my son." Romero specifically stated to Plaintiff that Defendant LSP Trooper Scott Lopez, "wants you arrested for simple assault," and Romero will be called as a witness at trial to substantiate that fact. Further, Ms. Mendy Girouard stated on body-cam video of St. Martin Parish Deputy Mathiew Alexander on or around May 4, 2022 that Plaintiff committed, "aggravated assault," which is a statement she could have made only in speaking with either Defendant Scott Lopez and/or Defendant Benjamin Cole Lopez, either of whom would have engaged in blatant defamatory statements about Plaintiff in making any such claim about Plaintiff. While Plaintiff was arrested for a misdemeanor for one count of violation of LA R. S. 14:100.1 (Obstruction of Public Passage), District Attorney Duhé almost immediately declined to prosecute that charge; furthermore, retired law enforcement officers and attorneys with whom I have consulted, and whom I anticipate calling as witnesses at trial, have described that arrest as "baseless," "trumped up," and as, "a member of one law enforcement agency (the St. Martin Parish Sheriff's Baily Romero) doing a 'favor' for another member of another law enforcement agency (Louisiana State Police's Trooper Scott Lopez) and that such an action would have 'never' have been engaged in had the complaint Benjamin Cole Lopez's father, Scott Lopez, not been an LSP Trooper who actively sought Plaintiff's arrest." Further, Plaintiff anticipates calling a retired Louisiana State Police Trooper who will testify to the fact that St. Martin Parish Deputy Baily Romero conducted a flawed interview of Benjamin Cole Lopez on April 25, 2022 when he asked him very leading questions of Benjamin Cole Lopez, and those questions and their responses (most especially, "He could have,") are all captured on Deputy Baily Romero's body-cam video, and that video will most certainly be introduced as evidence at trial in this matter. That retired LSP Trooper will further testify that the proper procedure would have been to take the matter to the DA; however, fearing the DA would decline to sign off on an arrest warrant application, St. Martin Parish Deputy Baily Romero opted to bypass the DA's Office and instead submit the application directly to the judge assigned to hear this case, Judge Lewis Pittman. When Judge Pittman declined to approve the arrest warrant application, Deputy Romero then submitted the application to Judge deMahy who, for reasons only she can provide, opted to sign off on the arrest warrant within five (5) minutes of it being placed in front of her a little after 9 p.m. to seemingly indicate a sense of urgency in the need for my arrest. Public records requests of the St. Martin Parish Sheriff's Office have demonstrated only approximately three (3) instances in which the DA was bypassed and the arrest warrant directly submitted to the judge over the last several years, and every one of those entailed drug possession and/or possession with intent to distribute. That is the class of folk the collusion activities of Defendant Scott Lopez and St. Martin Parish Deputy Baily Romero debased Plaintiff into! In any event, Plaintiff continues to evaluate the possibility of pursuing a lawsuit against the St. Martin Parish Sheriff's Office for a blatant violation of Plaintiff's Constitutional Rights entailing that arrest made possible only by the acts of collusion on the parts of Defendants Scott Lopez and Benjamin Cole Lopez and, in particular Defendant Scott Lopez's collusion with St. Martin Parish Deputy Baily Romero to perhaps include individuals higher up on the food chain at the St. Martin Parish Sheriff's Office.

INTERROGATORY NO. 8:

Please state whether you are involved in any capacity with Robert Burns.

RESPONSE TO INTERROGATORY NO. 8:

Mr. Burns is a video blogger and has been for seven years. Plaintiff discovered him when he Googled "FEMA fraud," and an interview Burns conducted with Mr. Corey delaHoussaye came up. Plaintiff watched the video interview (which is about an hour in length) at a time with Mr. delaHoussaye was still facing criminal charges in 21st JDC. Plaintiff then contacted Mr. Burns, whom he had never before spoken with in his life, using the contact information readily available on his blog website which invites anyone to contact him if that individual, "has a concern about a Louisiana government operation." That is how Plaintiff met Robert Burns, and Plaintiff's involvement with him is identical to many other individuals with whom he has featured on his blog, all of which is readily assessable at www.SoundOffLA.com and which Defendant Scott Lopez is integrally familiar given the sheer number of texts that he sent to St. Martin Parish Director of Administration Calder "Pop" Hebert together with the commentary of either those two individuals accompanying texts with links for those features.

INTERROGATORY NO. 9:

Please state whether you are involved in any capacity with the media outlet "Sound Off Louisiana.com". If so, please state your capacity.

RESPONSE TO INTERROGATORY NO. 9:

As reflected in the response to Interrogatory # 8 above, Plaintiff's involvement in Sound Off Louisiana is limited to being featured as the subject matter on posts of that blog no differently than many other individuals to include, but not be limited to: Corey delaHoussaye, Murphy Painter, Chester Cedars, Mendy Girouard, Congressman Garret Graves, U. S. Sen. John Kennedy, Louisiana ACLU Legal Director Nora Ahmed, Community Activist Belinda Parker-Brown, Louisiana State Police Commission Member Jared Caruso-Riecke, Louisiana State Police Commission Member Eulis Simien, former Louisiana State Police Commission Executive Director Cathy Derbonne, former newspaper reporter Dwayne Fatherree, dentist C. Ryan Haygood, Mona Hardin (mother of Ronald Greene), numerous Louisiana State Troopers appearing before the Louisiana State Police Commission, attorney Jill Craft, convicted felon attorney Larry S. Bankston, former Cosmetology School Owner Nedla Dural, Cosmetology attorneys Sheri Morris and Celia Cangelosi, Louisiana State Board of Cosmetology Chairman Edwin Neill, Defendant Scott Lopez, State Rep. Richard Nelson, Attorney General Jeff Landry, Joelle Dubroc, Gov. John Bel Edwards, Louisiana Inspector General Stephen Street. There are many more, but this list will serve as a good start. Defendants can easily scroll through past posts to see many others at www.SoundOffLA.com.

INTERROGATORY NO. 10:

Please state whether you have assisted Sound Off Louisiana in writing disparaging and defamatory comments about Defendants, **SCOTT MICHAEL LOPEZ** and/or his son, **BENJAMIN COLE LOPEZ**.

RESPONSE TO INTERROGATORY NO. 10:

Plaintiff denies having made any statement about either of the referenced defendants that is not fully and completely backed up by videos of Scott and Benjamin Lopez, documents executed by Scott and/or Benjamin Lopez, statements made to others (e.g. Blake Dubroc and Mendy Girouard) which are well documented by St. Martin Parish Sheriff's reports; furthermore, Plaintiff's complaint against Defendant Scott Lopez entailing his statements made on January 6, 2022 wherein Plaintiff contended Defendant Scott Lopez engaged in "Conduct Unbecoming of a Louisiana State Trooper" was in fact sustained by his employer, Louisiana State Police, and Trooper Lopez declined to pursue an appeal of that disciplinary decision by Louisiana State Police. If either Defendants are of the belief that Defamatory statements were made, they have the same remedy available to them that Plaintiff is presently pursuing the in the instant matter.

INTERROGATORY NO. 11:

Please state whether the attached Judgment (Exhibit A) was rendered against you ruling that you were using the subject property in a commercial capacity.

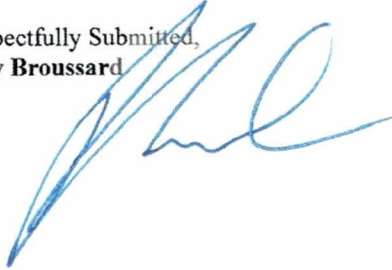
RESPONSE TO INTERROGATORY NO. 11:

The judgment is the best evidence of its **present** contents; moreover, that judgment constitutes a Preliminary Injunction (notwithstanding Mendy Girouard's false statements captured on videotape that, "the judge signed a Permanent Injunction earlier today"). Plaintiff is supremely confident in his ability to annul that judgment upon Plaintiff pursuing (on his own timetable) the Permanent Injunction hearing. Rest assured that, at that Court Hearing, Defendant Scott Lopez will

be placed on the witness stand and grilled on all of the false and defamatory statements that he has made about Plaintiff, many of which are captured on videotape (e.g. "purple truck," "damn near assaulted my son") along with video refuting that outrageous and defamatory accusation entailing Defendant Benjamin Cole Lopez as evidenced by his act of driving back by Plaintiff and taunting him with his sarcastic statement (after rolling down his window of), "Hope you got a good picture (of me)."

Respectfully Submitted,
Billy Broussard

BY:



CERTIFICATE OF SERVICE

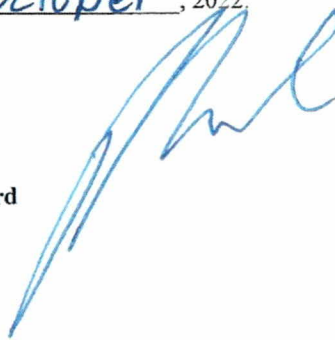
I hereby certify that a copy of the above and foregoing has this day been forwarded to all known counsel of record by:

- 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 13 day of October, 2022.

BY:

Billy Broussard



BILLY BROUSSARD * 16TH JUDICIAL DISTRICT COURT

VERSUS NO. 91706-H * PARISH OF ST. MARTIN

SCOTT MICHAEL LOPEZ, ET AL * STATE OF LOUISIANA

PLAINTIFF'S RESPONSE TO DEFENDANTS' FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

Please produces copies of any/all profit and loss statements, business ledgers, and tax returns for Billy Broussard Farm and Land Development, LLC and Broussard Companies, LLC for the last five (5) years.

RESPONSE TO RQUEST FOR PRODUCTION NO. 1:

Plaintiff objects to this request as being overly broad, burdensome, and not reasonably calculated to lead to admissible evidence. Plaintiff further objects to such production on grounds that his CPA has not yet completed the returns for the period for which this Restraining Order and Ordinance took effect as Plaintiff has incurred significant additional expenses defending against litigation pertaining to same.

REQUEST FOR PRODUCTION NO. 2:

Please produce copies of any/all business records, profit and loss statements, sale ledgers, for all business conducted at subject location of 1675 Duchamp Road, Broussard, Louisiana, 70518.

RESPONSE TO RQUEST FOR PRODUCTION NO. 2:

See response to Request for Production # 1 above.

REQUEST FOR PRODUCTION NO. 3:

Please produce any evidence which you rely upon to support your position that you were NOT conducting commercial activity on subject property located at 1675 Duchamp Road, Broussard, Louisiana, 70518.

RESPONSE TO RQUEST FOR PRODUCTION NO. 3:

There is no evidence to produce. As stated in one of the Requests for Admission, notwithstanding the fact that Defendant LSP Trooper Scott Lopez stated falsely to the Planning and Zoning Commission Members on January 6, 2022 that Plaintiff had permitted the owner of a "purple truck" to offload vegetative materials on Plaintiff's property and charged the owner of that truck for doing so, the fact remains that Plaintiff has have never (emphasis on the word "never") charged any individual one red cent to offload materials on Plaintiff's property. Furthermore, there is no electrical hookup on the property, no sewer or water lines, nor an office for conducting business activity. Plaintiff was developing the property for purposes of farming activities; however, the Parish's ill-advised litigation stopped even those efforts (which are permissible under R-2 zoning) dead in their tracks.

REQUEST FOR PRODUCTION NO. 4:

These Requests for Production are deemed to be continuing and should **Plaintiff** become aware of additional information which changes or modifies any answers herein, Defendants specifically request that your answers be supplemented and/or amended.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

As this is not a specific request, no specific response is provided.

Respectfully Submitted,

BY:

Billy Broussard
1307 S Main
Breaux Bridge LA 70517
Tel: (337) 316-6193
Email: 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 13 day of October, 2022.

BY:

Billy Broussard

**2022 Schedule of Jobs Lost From Added Hauling Costs Resulting from
Malicious, Defamatory Falsehoods Uttered by Scott & Benjamine Lopez**

Contact Info on Prospect	Bid Submitted Date	Amount	Gross Profit Factor	Loss
337-552-4450	10/12/22	7,500.00	65%	4,875.00
337-247-4303	10/19/22	5,500.00	65%	3,575.00
337-349-7363	10/26/22	2,600.00	65%	1,690.00
337-909-4744	10/31/22	700.00	85%	595.00
337-552-5432	08/05/22	4,500.00	65%	2,925.00
337-296-7177	11/11/22	3,000.00	65%	1,950.00
337-339-5627	11/05/22	90,000.00	65%	58,500.00
337-591-3921	09/19/22	2,500.00	65%	1,625.00
225-235-3789	09/19/22	2,475.00	65%	1,608.75
337-739-6988 (haul off not needed)	09/21/22	2,400.00	0%	0.00
337-258-4175	09/22/22	10,000.00	65%	6,500.00
337-315-7206	09/23/22	3,500.00	65%	2,275.00
337-849-5635	09/17/22	5,000.00	65%	3,250.00
337-852-4446	10/05/22	5,000.00	65%	3,250.00
832-744-9191	10/10/22	3,000.00	65%	1,950.00
337-441-1890	10/11/22	4,700.00	65%	3,055.00
337-277-3354	08/24/22	3,400.00	65%	2,210.00
337-322-6522	08/25/22	3,200.00	65%	2,080.00
337-658-9253	08/26/22	3,000.00	65%	1,950.00
337-344-3710	08/26/22	2,500.00	65%	1,625.00
337-295-4814	08/30/22	4,800.00	65%	3,120.00
337-303-5808	08/31/22	2,500.00	65%	1,625.00
337-230-7600	09/06/22	3,700.00	65%	2,405.00
337-652-5827	09/06/22	2,600.00	65%	1,690.00
337-739-6092	09/07/22	15,000.00	65%	9,750.00
337-849-8211	08/01/22	5,500.00	65%	3,575.00
337-257-8850	08/09/22	2,700.00	65%	1,755.00
337-315-6001	08/09/22	6,250.00	65%	4,062.50
337-296-8636	08/15/22	4,500.00	65%	2,925.00
337-962-2821	08/16/22	800.00	65%	520.00
337-315-0557	08/19/22	2,050.00	65%	1,332.50
337-316-0050	08/19/22	1,850.00	65%	1,202.50
337-349-0378	08/16/22	18,000.00	65%	11,700.00
337-831-4452	07/13/22	2,600.00	65%	1,690.00
337-339-7151	07/13/22	1,800.00	65%	1,170.00
832-928-4602	07/18/22	8,000.00	65%	5,200.00
337-278-5450	07/18/22	9,000.00	65%	5,850.00
337-520-9906	07/18/22	14,000.00	65%	9,100.00
337-330-6166	07/20/22	11,400.00	65%	7,410.00
337-255-4895	07/20/22	6,500.00	65%	4,225.00
337-298-4193	07/22/22	1,850.00	65%	1,202.50
337-654-4603	07/27/22	800.00	65%	520.00
337-356-1959	06/20/22	2,000.00	65%	1,300.00
225-955-1260	06/17/22	2,500.00	65%	1,625.00
337-692-1714	06/22/22	500.00	65%	325.00
337-344-1873	06/28/22	3,500.00	65%	2,275.00
337-852-9759	07/05/22	3,000.00	65%	1,950.00
337-321-1372	07/08/22	2,500.00	65%	1,625.00
337-591-7577	07/08/22	1,250.00	65%	812.50
337-280-2763	05/05/22	2,200.00	65%	1,430.00

Exhibit "B"

**2022 Schedule of Jobs Lost From Added Hauling Costs Resulting from
Malicious, Defamatory Falsehoods Uttered by Scott & Benjamine Lopez**

Contact Info on Prospect	Bid Submitted Date	Amount	Gross Profit Factor	Loss
337-326-3069	05/05/22	9,500.00	65%	6,175.00
337-201-9105	05/05/22	700.00	65%	455.00
337-258-9409	05/11/22	2,500.00	65%	1,625.00
337-278-8260	05/12/22	7,500.00	65%	4,875.00
337-280-0441	05/20/22	3,400.00	65%	2,210.00
337-354-5451	06/01/22	2,600.00	65%	1,690.00
337-662-7090	06/07/22	6,750.00	65%	4,387.50
337-349-5399	06/07/22	7,500.00	65%	4,875.00
337-298-7459	04/07/22	3,000.00	65%	1,950.00
337-257-0248	04/12/22	3,000.00	65%	1,950.00
337-230-6138	04/11/22	5,800.00	65%	3,770.00
337-654-6716	04/20/22	3,000.00	65%	1,950.00
225-202-2589	04/25/22	0.00	65%	0.00
337-207-5556	04/26/22	7,000.00	65%	4,550.00
337-322-5276	04/23/22	0.00	65%	0.00
337-534-9374	05/04/23	14,800.00	65%	9,620.00
337-242-4477	05/05/23	3,200.00	65%	2,080.00
337-344-5342	03/16/22	6,000.00	65%	3,900.00
504-884-6827	03/28/22	0.00	65%	0.00
337-258-4699	03/30/22	0.00	65%	0.00
337-298-8529	03/24/22	6,000.00	65%	3,900.00
337-207-1908	03/29/22	0.00	65%	0.00
337-308-2230	03/30/23	1,800.00	65%	1,170.00
312-749-3435	04/05/22	17,000.00	65%	11,050.00
337-789-1971	04/07/22	2,100.00	65%	1,365.00
337-233-2442	05/17/22	2,200.00	65%	1,430.00
337-849-3289	05/22/22	7,500.00	65%	4,875.00
337-258-7296	05/26/22	13,000.00	65%	8,450.00
Totals		<u>443,975.00</u>		<u>287,163.75</u>

From: Eric Haik <ehaik@hmg-law.com>
Date: December 23, 2022 at 10:03:05 AM CST
To: Billy Broussard <billy@billybroussard.com>
Cc: Elaina Champagne <echampagne@hmg-law.com>, Ali LeBlanc <ali@hmg-law.com>
Subject: RE: Responding to Interrogatory # 3 - DISCOVERY

Mr. Broussard

I have asked you to answer a simple question (Interrogatory No. 3), as cited below. Unfortunately, you seem to provide everything but an answer to the below request. Thus, at this time, we will keep our Motion to Compel set for hearing on 1/3/22 so that we can request for the Court to compel you to respond accordingly.

INTERROGATORY NO. 3:

Please list all vehicles owned and operated and used for business operations under Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC along with the year of said vehicle, make and model, inclusive of all heavy equipment used in business operations.

Eric T. Haik



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

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Exhibit "C"

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: Thursday, December 22, 2022 12:44 PM
To: Eric Haik <ehaik@hmg-law.com>
Cc: Elaina Champagne <echampagne@hmg-law.com>; Ali LeBlanc <ali@hmg-law.com>
Subject: Re: Responding to Interrogatory # 12 - DISCOVERY

Mr. Haik:

First, thank you so much for your email of earlier this morning, and I am happy to hear that, with the provision of my CPA's contact information, RFP 2 & 3 now seems moot. I concur with that assessment.

In responding to your inquiry regarding Interrogatory # 3 entailing my business vehicles, which I'll replicate that interrogatory at this time for convenience's sake,

INTERROGATORY NO. 3:

Please list all vehicles owned and operated and used for business operations under Billy Broussard Farm and Land Development, LLC and/or Broussard Companies, LLC along with the year of said vehicle, make and model, inclusive of all heavy equipment used in business operations.

you have previously indicated to me that you need to obtain the listing referenced in Interrogatory # 3 in order to rule out the possibility that, on January 6, 2022 at the St. Martin Parish Planning and Zoning Commission meeting, your client, Scott Lopez, may have told the truth about it being one of my vehicles that he asserted to that body that I had been, "allowing other companies and people to dump on his property illegally since he purchased the land." (See 5:52 mark of video link to be provided shortly).

We need to have a very clear understanding about something that is irrefutable as the words came out of Scott Lopez's own mouth and were captured on videotape entailing the truck in question. Here are the facts:

- Mr. Lopez referenced the SPECIFIC truck about which he alleges (falsely) that I allowed for the above-quoted act to transpire. He even provided a picture of it to St. Martin Parish Government officials. **Please see from the 14:14 – 14:40 mark of this video:** <https://youtu.be/X2HbtiUJeNO>. [Note: Mr. Lopez made his false statement referenced above on that same video, again, that statement on Mr. Lopez's part begins at the **5:52 mark** of the video link just provided.]
- Through public records request, I have obtained the photo Mr. Lopez supplied to SMPG regarding the truck. I have attached that picture, supplied by Mr. Lopez to SMPG officials on August 11, 2021, with this email. I am also supplying with this email two other photos of the same truck.
- As you are aware, I contacted the owner of the truck referenced by Mr. Lopez, Mr. Arthur Trahan, on May 2, 2022, and recorded the phone call with Mr. Trahan, who readily admitted that he, "knows Scott real good." Here is the link for that audio recording: <https://youtu.be/tN1bHv6qJFA>.

So, let's consider the fact that Mr. Lopez has never denied that this is the truck he referenced, and further consider the fact that nobody even disputes that the truck does in fact belong to Trahan, who made the following statements on the audio link just provided:

- 1) He's never gone on my property,
- 2) He almost never hauls vegetative materials but mainly hauls materials for construction,
- 3) That he has made deliveries to my Laotian neighbors (about whom I'm in possession of defendant Dubroc's family threats against those neighbors),
- 4) That he knows Mr. Lopez "real good,"
- 5) That he also is related to Mr. Lopez's one-time supervisor, John Trahan,
- 6) That Lopez's neighbors have blocked off Duchamp Road and told him, "Cuz, you can't pass,"

7) That he responded to Duchamp Road being blocked off with, "You better unblock this road. They got people on this road trying to haul materials."

Hence, unless you are willing to tell me that Mr. Lopez no longer asserts that this is the truck in question (in which case I will explore the ramifications of him supplying this truck as his "evidence" to back up his oral statement to SMPG officials and subsequently withdrawing his very emphatic statements to them that it is in fact the truck in question), then my position remains unchanged on supplying the requested information regarding Interrogatory # 3.

So, if you wish to continue with the Motion to Compel, I understand your stand, and I will merely supply this email and reference it in my Opposition Memorandum entailing same and we can proceed from there.

Again, thank you so much for your email of earlier this morning, and I hope you and all the family enjoy a Merry Christmas and a Happy New Year.

Billy Broussard

(337) 316-6193







Sent from my iPhone

On Dec 22, 2022, at 9:47 AM, Eric Haik <ehaik@hmg-law.com> wrote:

Mr. Broussard

We are in receipt of your response to our 2nd Set of Interrogatories, specifically, Interr. No. 12, wherein you provided your CPA information, and thank you for same. Due to the fact that we can obtain the requested financial information that was requested in RFP No. 2&3, our Motion to Compel on those particular requests would seem moot.

Your Response to Interr. No. 3, regarding your business vehicles, is still outstanding. I would respectfully request that you reconsider your position and produce this information. If you produce an appropriate response to Interr. No. 3, we would be inclined to remove our Motion to Compel from the January 3 docket. If not, we will have no choice but to move forward with compel hearing. Please let us know.

Thank you,

Eric T. Haik

<image002.jpg>

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From: Billy Broussard <billy@billybroussard.com>

Sent: Thursday, December 22, 2022 8:10 AM

To: Eric Haik <ehaik@hmg-law.com>; Elaina Champagne <echampagne@hmg-law.com>; Ali LeBlanc <ali@hmg-law.com>

Subject: Responding to Interrogatory # 12

EXHIBIT "D": AUDIO RECORDING OF PHONE CALL BETWEEN BILLY BROUSSARD AND ARTHUR TRAHAN
ON OR AROUND MAY 2, 2022.

Exhibit "D"

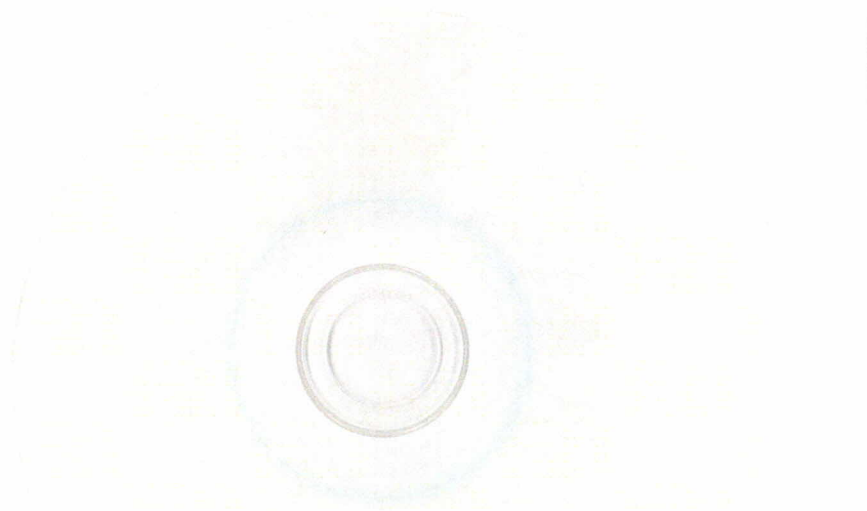


Photo call between Bill Broussard
and Arthur Trahan on/around May 2, 2022