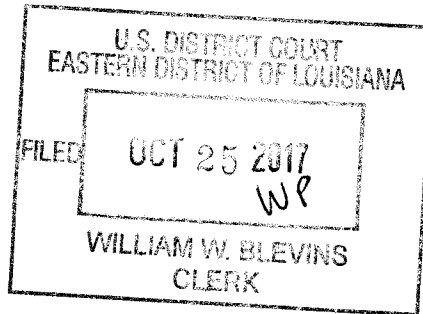


**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

Howard Anthony Brown  
And Belden Batiste  
**Plaintiff**



Civil Action No. 17-9627

JTM-KWR

**-Vs-**

TOM SCHEDLER, in his official capacity as Secretary of State;  
JEFF LANDRY, in his official capacity as Attorney General;  
Judge JAMES F. MCKAY, III, Judge EDWIN LOMBARD,  
Judge DANIEL L. DYSART, Judge ROSEMARY LEDET,  
Judge PAULA A. BROWN and Judge KERN A. REESE,  
in their official capacities

**Defendants**

**MOTION FOR DEFAULT JUDGMENT, PURSUANT FED. R. CIV. P. 55 (b) (1)**

**COMES NOW INTO COURT**, in proper person Plaintiffs Howard Anthony Brown and Belden Batiste Pursuant to Federal Civil Judicial Procedure and Rules, Rule 55(b) (1) to request that the Clerk of Court enter Default Judgment against Defendants Judge JAMES F. MCKAY, III; Judge EDWIN LOMBARD; Judge DANIEL L. DYSART; Judge ROSEMARY LEDET; Judge PAULA BROWN and Judge KERN A. REESE on the following basis:

1.

In accordance with the requirement of FED. R. CIV. P., Rule 55 (b)(1), Howard Anthony Brown and Belden Batiste has submitted an Affidavit showing the amount of damages to which they are entitled to from the Defendants Judge JAMES F. MCKAY, III; Judge EDWIN LOMBARD; Judge DANIEL L. DYSART; Judge ROSEMARY LEDET; Judge PAULA BROWN and Judge KERN A. REESE.

Fee \_\_\_\_\_  
Process \_\_\_\_\_  
☒ Dktd \_\_\_\_\_  
CtRmDep \_\_\_\_\_  
Doc. No. \_\_\_\_\_

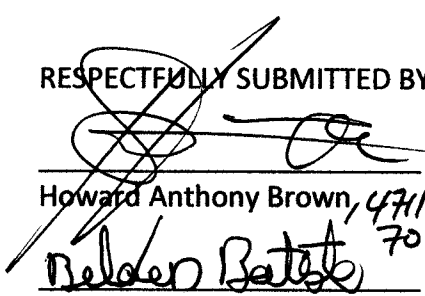
2.

Defendants are liable to plaintiffs for the total sum certain of 6/8 of the 10,000,000.00 sought in this litigation, and in the alternate be mandated to implement the other types of relief in the form of issuing a Declaratory Judgment that the defendants policies and practice violate plaintiffs Rights as to participate in the political process as outlined in the Voters Rights Act of 1965, and that Defendants be mandated and their agencies from utilizing any of the Jim Crow Laws against candidates running for public office.

WHEREFORE, for all the above and foregoing Howard Anthony Brown and Belden Batiste request that the Clerk of Court to enter a Default Judgment against Defendants Judge JAMES F. MCKAY, III; Judge EDWIN LOMBARD; Judge DANIEL L. DYSART; Judge ROSEMARY LEDET; Judge PAULA BROWN and Judge KERN A. REESE. Pursuant to Federal Civil Judicial Procedure and Rules, Rule 55(b) (1).

Done this 25<sup>th</sup> Day of October 2017 at Orleans, Louisiana.

RESPECTFULLY SUBMITTED BY:

  
Howard Anthony Brown, 4711 MARQUE DR. N.O. LA

70127, 504 251-1203

  
Belden Batiste

Belden Batiste

1421 N. MIRO 70119 N.O. LA

504-872-5056

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 25<sup>th</sup> Day of October, 2017, I placed a true and correct copy of the foregoing MOTION FOR DEFAULT JUDGMENT, PURSUANT TO FED. R. CIV. P., RULE 55(b) (1) in the United States Mail and forward to defendants at the following address:

Judges, JAMES F. MCKAY, III; EDWIN LOMBARD;  
DANIEL L. DYSART; ROSEMARY LEDET  
and PAULA A. BROWN  
400 Royal Street  
New Orleans, Louisiana 70130

and

Judge KERN A. REESE  
4824 Bancroft Drive  
New Orleans, Louisiana 70122



Howard Anthony Brown



Belden Batiste