

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

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<b>MARY R. MAYFIELD, Plaintiff,</b>	<b>§</b>	<b>CIVIL ACTION NO. 5:15-cv-02374</b>
<b>VS.</b>	<b>§</b>	<b>JUDGE ELIZABETH E. FOOTE</b>
<b>DESOTO PARISH POLICE JURY, REGGIE C. ROE, GARY V. EVANS and STEVE BROWN, Defendants</b>	<b>§</b>	<b>MAGISTRATE JUDGE MARK HORNSBY</b>
	<b>§</b>	<b>JURY TRIAL DEMAND</b>

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**COMPLAINT**

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**INTRODUCTORY STATEMENT**

1. This action arises under the provisions of Title VII of the Civil Rights Act of 1964 as amended, 42 U.S.C. § 2000(e), et. seq., 42 USC § 1983, 42 USC § 1981, et. seq., 42 U.S.C. § 1985, the United States Constitution, Fourteenth Amendment and similar provisions of state law, including but not limited to Article I, Sections 2, 3 and 7 of the Louisiana Constitution, LSA Civil Code Articles 1967, 1983, 2315 and 2320 and LSA-RS 23:301, 23:332 and 23:967, LSA-RS 51:2231 and 51:2256, the strong public policy set forth in R.S. 72:1169 and any other applicable statutes or provisions.

2. Plaintiff is seeking declaratory relief, injunctive relief, and damages to redress the deprivation of her rights from employment discrimination on the basis of sex and in retaliation against her for the exercise of her rights in connection with and in opposition to the unlawful discrimination practices perpetrated against her by defendants, their agents or employees.

## JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction of the claims asserted in this Complaint under Title VII of the Civil Rights Act of 1964 as amended, Title VII 42 U.S.C. § 2000(e) et. seq., 42 U.S.C. §§ 1981, 1983 and 1985. and 28 U.S.C. §§ 1343(3), (4), and 1331.

4. Jurisdiction is further invoked pursuant to 28 U.S.C. § 1367 in the exercise of this Court's pendent or supplemental jurisdiction with respect to the Louisiana state law claims made herein that are so related to the claims within the district court's original jurisdiction that they derive from the same nucleus of operative facts and are part of the same case or controversy under Article III of the United States Constitution.

5. Plaintiff also invokes this Court's jurisdiction under the Declaratory Judgment Act, 28 U.S.C. § 2201 and 2202 declaring and adjudging that the unlawful employment practices alleged herein deprive and withhold from plaintiff rights secured by 42 U.S.C. § 1983 and 2000(e) et seq., and United States Constitution, Fourteenth Amendment.

6. Venue is proper in this district and division pursuant to 28 U.S.C. § 1391 because plaintiff and defendants reside in this district, defendants do business and the alleged unlawful employment practices and discrimination were and are being committed in the Western District of Louisiana.

## PARTIES

7. Plaintiff, **MARY R. MAYFIELD**, is a major resident and domiciliary of the State of Louisiana, whose mailing address is 139 Taylor Drive, Logansport, LA 71049, she is a former employee of the DeSoto Parish Police Jury and brings this claim to

recover damages due to and resulting from her wrongful and constructive discharge, a breach of her employment contract, discrimination, reprisal and retaliatory actions of the various defendants herein for plaintiff's exercise of her rights as an employee and as a citizen to oppose and resist defendants' unlawful employment practices.

8. Made **Defendants** herein are:

(a) **DeSoto Parish Police Jury** a corporate political entity and subdivision of the State of Louisiana, which is domiciled in Mansfield, DeSoto Parish, Louisiana, whose mailing address is 101 Franklin Street, Mansfield, LA, 71052, and which may be served through the Parish Administrator, Steve Brown, at the same address.

(b) **Reggie C. Roe**, an adult male citizen, who currently serves as a member of the DeSoto Parish Police Jury, in the capacity of president, and who may be served at his residence, 877 Friendship Road, Frierson, LA 71027. He is made defendant in his individual and official capacity.

(c) **Gary V. Evans**, an adult male citizen and the duly elected District Attorney of DeSoto Parish, Louisiana, who serves and acts as the civil attorney and advisor to the DeSoto Parish Police Jury, who may be served at his office located at 307 Gibbs Street, Mansfield, LA 71052. He is made defendant in his individual capacity.

(d) **Steve Brown**, an adult male citizen, who is administrator for the DeSoto Parish Police Jury, and who may be served at his office located at 101 Franklin Street, Mansfield, LA 71052. He is made defendant herein in his individual and official capacity.

### **EMPLOYER STATUS**

9. Defendant DeSoto Parish Police Jury, is plaintiff's former employer and subject to the provisions of Title VII of the Civil Rights Act of 1964, as amended, in that it is a governmental entity and political subdivision and are engaged in a business affecting interstate commerce and have employed the requisite number of persons for each working day in each of the twenty or more calendar weeks in the current or calendar year. Defendants, as agents, officers and representatives of the DeSoto Parish Police Jury are likewise "employers" and/or "supervisors" of the plaintiff as that term is prescribed and defined by Title VII, the jurisprudence and the Louisiana Anti-Discrimination Laws ("LEDL").

### **CONDITIONS PRECEDENT TO SUIT**

10. Plaintiff has complied with the conditions precedent to suit under Title VII having timely filed charges of discrimination against the defendants with the Equal Employment Opportunity Commission ("EEOC") who investigated plaintiff's charges and issued a Right to Sue letter dated September 1, 2015. A true and correct copy of the letter is attached to this complaint as Exhibit "A" and incorporated by reference.

11. Plaintiff has complied with the authorization set out in the Right to Sue letter by instituting this action within 90 days of the date of her receipt of the letter.

12. Plaintiff, in accordance with appropriate provisions of state law including La R.S. 23:303(c), made timely demand upon defendants and made a good faith effort to resolve the employment discrimination and other illegal activity complaints herein set forth without success.

### **FACTS**

13. Plaintiff is a white female citizen of the United States, resides in Logansport, DeSoto Parish, Louisiana, and is a former employee of defendant DeSoto Parish Police Jury.

14. Plaintiff, Mary R. Mayfield, began her employment with the defendant, DeSoto Parish Police Jury, on June 1, 2010.

15. Most recently, plaintiff was serving as Executive Director of the DeSoto Parish Police Jury Office of Community Services located at 404 Polk Street, Suite B, Mansfield, LA 71052.

16. Plaintiff received excellent performance evaluations of her work as the Executive Director of Community Services for the DeSoto Parish Police Jury and no reprimand or disciplinary action had ever been taken against her.

17. Plaintiff has always faithfully fulfilled the duties, obligations and responsibilities of her position to the police jury, the community and the client's served.

18. At all times relevant hereto, defendant Reggie Roe was the senior official and management officer of the DeSoto parish Police Jury; he was also committee member and chair of certain police jury committees plaintiff was required to meet with, report and be answerable to, including but not limited to the executive, administrative, personnel, budget and finance and community service committees.

19. At all times relevant hereto, defendant Reggie Roe was in a position and had the ability to significantly change and/or negatively impact plaintiff's employment status such as to demote, promote, transfer, discipline or change her job duties.

20. At all times relevant hereto, defendant Steve Brown was parish administrator and direct supervisor of the plaintiff, he was in a position and had the

ability to significantly change and/or negatively impact plaintiff's employment status such as to demote, promote, transfer, discipline or change her job duties.

21. At all times relevant hereto, defendant Gary Evans was the civil attorney and advisor to the DeSoto Parish Police Jury and its president, Reggie Roe, who when acting in such capacity was the agent, servant and employee of the police jury; and he was in a position and had the ability to significantly change and/or negatively impact plaintiff's employment status such as to demote, promote, transfer, discipline or change her job duties.

22. On or about May 27, 2015, Police Jury President, Reggie Roe, kept trying to show the plaintiff pictures of women without tops and bras on from his cell phone. He was also engaged in the making of sexual comments about women's "boobs" and "boob jobs" and other parts of their anatomy and he had previously engaged in such similar and inappropriate conduct with other female employees of the police jury who had voiced their objections to such offensive conduct to their supervisors, the personnel department and other officers and employees.

23. Moments later, while plaintiff was seated in Steve Brown's office to talk to him about her weatherization program audit items, Reggie Roe came into Mr. Brown's office brandishing his cell phone with the same inappropriate pictures.

24. Such conduct was inappropriate, offensive, unwelcome and unacceptable to the plaintiff and to the other female employees of the police jury and the continuation thereof created and establish a hostile work environment.

25. On May 28, 2015, plaintiff complained (filed a formal complaint) to human resources designee, Linda Gatlin, and to her supervisor, Steve Brown, parish

administrator on her own behalf and on behalf of other female employees who were offended by such conduct but feared the loss of employment if they should also personally complain.

26. When plaintiff described the situation to Steve Brown, his response was “be glad you didn’t see them because they didn’t even have any t-shirts on.”

27. Steve Brown asked plaintiff if she was sure she was speaking on behalf of all the females in the office to which plaintiff said yes, with the exception of one employee who seemed to encourage Reggie Roe’s behavior and referred to him as “Papa Roe.”

28. Later that day, when plaintiff went into Malisa Laffitte’s (assistant treasurer) office, she asked plaintiff “why so glum?” Plaintiff told her that she felt bad for putting Steve Brown in such an awkward position and explained that she has officially filed a sexual harassment complaint on Reggie Roe with the police jury.

29. Malisa responded with “well, first of all, it was bound to happen sooner or later, and as far as Steve goes, don’t worry about it, it ain’t nothing he hasn’t heard before.”

30. Plaintiff asked Malisa what she meant by that and Malisa said that they have all complained to Steve about Reggie Roe’s behavior before, especially when Reggie pulled the stunt on Cynthia Cruise.

31. Plaintiff asked what stunt and Malisa told her that Cynthia Cruise and Reggie Roe were walking down the hall and Reggie stopped at the men’s room door and told Cynthia “you may need to step in here and give me a hand with this.”

32. On June 1, 2015, during a police jury meeting, Thomas Jones, personnel

committee chairman made the comment and reminded all in attendance that “ We need somebody (HR) to work with our supervisors and office staff....a person to take care of the business for us to make sure we stay compliant with the EEOC... we need an HR person – when we have a conflict because HR is supposed to be there for the employees”....This is my 4<sup>th</sup> year talking about this” (during which no effective action was taken by the police jury or its staff).

33. Ever since plaintiff complained of Mr. Roe’s inappropriate and offensive conduct, she has been subjected to continual harassment by Mr. Roe and by the other defendants, who on information and belief, acted individually, at the behest of and in concert with Mr. Roe and each other in retaliation and punishment of plaintiff for having made a sexual harassment complaint.

34. On June 23, 2015, plaintiff received a call from Malisa Laffitte, in which Reggie Roe was next to her telling her what to say to plaintiff on the telephone. It was so frustrating for Malisa that Reggie Roe told her to have plaintiff come over to the police jury office and talk to him personally.

35. Plaintiff was asked where her WAP (Weatherization Assistance Program) trucks were. Plaintiff told them the exact location of both trucks, one being in Bastrop at a residence and the other was on Interstate 20 headed to Mansfield.

36. Once plaintiff arrived at the police jury office, the first thing Reggie Roe said to her is that there was a report that one of her WAP trucks was involved in a drug deal and the police were called in Ouachita Parish. Plaintiff informed him there must be a mistake as her program doesn’t service that area.

37. Plaintiff advised Reggie Roe that if the police had been called, then surely



there was a police report made, from which information could be obtained. By this time, a crowd of employees gathered in the vicinity and overheard Mr. Roe's somewhat embarrassing interrogation of plaintiff.

38. Finally, Reggie Roe and the staff figured out that the alleged incident had happened the night before. When plaintiff called her staff person, he explained that he had driven to Ouachita to meet his son for dinner since they had missed father's day together. The son brought barbecue to the gas station and the two of them ate it together in the truck. Some officers came to the window and noted that they were eating, not committing a drug deal. They were simply victims of profiling by the gas station/store owner. The son of the employee is also an officer of the law so neither of them thought anything of police officers coming to chat with them.

39. Reggie Roe was clearly upset that it had not turned out to be what he thought (employees from plaintiff's department involved in a drug deal), although it was actually a good thing there was no crime committed that may have negatively affected the police jury.

40. On July 6, 2015, during the police jury meeting, Mr. Ernel Jones (juror and vice president of police jury), questioned the parish administrator and plaintiff's direct supervisor about spending certain grant money on housing. Ernel Jones then called plaintiff to the front and directly asked her to verify that he spoke to her some time ago about a client who needed help because she lived in a slum. Plaintiff simply reiterated that location. That was all she was asked by Ernel Jones, and she had no idea she would be asked this question in advance.

41. Ernel Jones and Mr. Brown had a heated discussion about whether

“LCDBG” (grant) money (water, sewage, roads, etc.) could be spent on housing but this did not mean anything to plaintiff. She did not know anything about the LCDBG grant money as it has nothing to do with and was not administered by her department.

42. On July 7, 2015, Steve Brown came to plaintiff’s office (maybe only the fourth time in 5+ years) and proceeded to ask her over and over if she had talked with Ernel Jones prior to the meeting (she said she did not). Steve Brown said that Ernel Jones had given him a lecture after the police jury meeting and he persistently asked plaintiff the same question over and over (approximately 6 or more times).

43. Plaintiff finally said “Steve, how about we just call Ernel on speaker phone and ask him.” Mr. Brown chose not to do so and chastised plaintiff for “being too aggressive” regarding her suggestion they call Ernel Jones.

44. Plaintiff asked Steve Brown “where is this coming from?” Mr. Brown responded that Reggie Roe (Police Jury President) told him “get Mary under control. She is behind all this” and told him (Steve) to “go see Mary Mayfield about it.” Steve also told Mary that Reggie is still miffed at her for other reasons (being her complaint about his inappropriate conduct and the WAP incident).

45. On July 22, 2015, plaintiff received a telephone call from Gary Evans from the District Attorney’s office telling her a homeless shelter property lease had been prepared for her department and was ready and she should come pick up the lease at his office. (On information and belief, Mr. Evans and Mr. Roe are personal friends).

46. As soon as Plaintiff walked into the door, Gary Evans went on a tirade regarding plaintiff and the community service programs she administered, stating loudly and angrily that they provide help and assistance which he referred to as “free shit to

them black people;” that “those mother fucking black people get everything.” He also angrily and falsely accused plaintiff and asked her “what do you think you’re doing siding with Ernel Jones, trying to get housing for those mother fucking blacks;” and “they get all the free shit already.”

47. Gary Evans then asked a client, Charlie, who was in the office, if “he wanted a free house.” Then proceeded to state “You ain’t the right color for that.” (Charlie is white).

48. Gary Evans went even further in his attempt to intimidate plaintiff and threatened her by saying “I can tell you right now, the police jury ain’t gonna fund no more programs giving those mother fucking blacks free housing. It ain’t gonna happen. You can forget that shit right now.”

49. Mr. Evans had never spoken to plaintiff like this before. The threatening and intimidating message was shockingly clear to plaintiff. The police jury is not going to fund her community services department and programs anymore. Neither she, her department nor her clients (many of whom are African American) are going to be treated fairly and without discrimination, which is contrary to the provisions of the law and to the terms, conditions and requirements of the grants, whether federal, state or local, and all of this from the district attorney and acting agent of the DeSoto Parish Police Jury, who feels perfectly free to refer to plaintiff’s clients as “mother fucking blacks.”

50. Everything Gary Evans said to plaintiff was designed and intended to completely discredit and threaten her entire career as her entire existence and complete job responsibility is to provide help and assistance to anyone who needs it

and is eligible to receive it without regard to their race, color or gender.

51. The comments, warnings, threats and attempt to intimidate made by Gary Evans to plaintiff were unexpectedly and unbelievably horrendous. The emotional distress, mental anguish and other negative impact on plaintiff was enormous.

52. Plaintiff was shocked, embarrassed, humiliated and demeaned by such rantings which were clearly an affront to her dignity, integrity, dedicated service and loyalty as an employee.

53. Plaintiff filed a sexual harassment, hostile environment and retaliation complaint with the EEOC on July 24, 2015, following the meeting with Gary Evans on July 22, 2015, which on information and belief, plaintiff alleges was planned and held by Gary Evans at the behest of and in concert with Reggie Roe.

54. On August 3, 2015, just before the police jury meeting was to take place, plaintiff was approached by defendant Reggie Roe and told "If Ernel calls you up front (to the speaking platform), do not go," putting plaintiff in a position of being disobedient no matter what she did.

55. On August 4, 2015, Steve Brown came to plaintiff's office to talk about the EEOC claim that she had filed. Plaintiff told Steve about the incident with Gary Evans on July 22, 2015 and told him that she was done with Reggie Roe and his attempt to intimidate her and that she was afraid of him and could not be alone with him.

56. Linda Gatlin from human resources then texted plaintiff and asked her to come to the police jury to meet with her and when asked who all was going to be there, Linda said that Steve and Reggie would be there. Plaintiff told her she did not think she could do that. Linda replied with "From what you just told me I must operate for the

jury.”

57. On August 5, 2015, Steve Brown kept trying to get plaintiff to agree to a meeting with Reggie Roe, Linda Gatlin and himself, and told plaintiff he believed that Reggie Roe wanted to apologize..

58. On August 7, 2015, plaintiff went to the police jury office to speak with Steve Brown about a grant. While seated outside, Steve proceeded to apologize to plaintiff for everything that has happened and said that he should never have allowed it (Reggie Roe's actions) to get this far.

59. At that time, Reggie Roe pulled up in his vehicle and plaintiff began to have a panic attack and had to leave the premises.

60. Part of the hostility was directed toward plaintiff by the three individual defendants, acting individually, jointly and in concert with each other, in retaliation for the exercise of her rights as an employee and for her refusal to participate in and/or approve or support violations of the law or the provisions and requirements of grants.

61. Reggie Roe forced plaintiff to work at least six (6) hours on Fridays, even after she was required to work fifty (50) hours already that week to meet a grant deadline. While she is supposed to be on salary, plaintiff has hundreds of documented overtime hours the police jury won't pay her for or give her comp time for since Reggie Roe became president.

62. Reggie Roe then began to come to all the department head meetings, where plaintiff is required to attend and participate, during which he just stared at plaintiff, in an effort to intimidate her.

63. Plaintiff is weary of being harassed by Mr. Roe and his "buddies". No one

else has been put under such intimidating scrutiny. The acts of retaliation against plaintiff have been blatantly obvious and upsetting to her, both physically and emotionally, to the point she does not believe she can continue to bear them and no reasonable person could do so.

64. Plaintiff is uncomfortable in the presence of Reggie Roe and does not feel safe being around him or left alone with him. Plaintiff is afraid of Reggie Roe.

65. Plaintiff has been unable to sleep, suffers from extreme stress and depression and is presently unable to cope with the hostile environment. She has been seen by a physician, and continues to be under his care and treatment, who prescribed her medication and told her to remain off work and referred her to a counselor.

66. On August 21, 2015 Steve Brown and Linda Gatlin from human resources held a meeting, without plaintiff's knowledge, with plaintiff's subordinates (Linda Spivey, Cherron Wilson, Michelle Hughes).

67. After the meeting, Michelle Hughes called plaintiff and informed her that Steve Brown had told plaintiff's subordinates that plaintiff was going to be off for an extended time of approximately 12 weeks, and informed the rest of the staff it would be 6 weeks.

68. Plaintiff is not sure where Mr. Brown got such information as she had not filed an application or made a request for FMLA leave and had not told anyone she was going to do so. Her only reason for being out is a doctor's excuse she received and presented to her employer, which excused her through Friday of that week ("at least"). She was suppose to go back to her doctor once he received the psychologist's findings and recommendations, which she has done so.

69. On August 21, 2015, plaintiff was informed by Linda Spivey to turn in her work equipment, but to keep the cell phone so that her subordinates could still contact her, with which directive she complied the next day (Saturday).

70. On Monday, August 24, 2015, Linda Spivey called plaintiff and informed her that Steve Brown had told her (Linda) to go to plaintiff's home and get the cell phone. Plaintiff advised that she would have her husband return it to Steve Brown the following day on Tuesday, August 25, 2015, which she did.

71. Plaintiff was also asked to turn in her keys to the Community Services Building and to her office and she was told the locks were changed by the police jury so that plaintiff "can't just walk in here and go to her office."

72. On September 1, 2015, plaintiff was informed that the appointment of a new "Interim" Executive Director was announced at the August 21, 2015 meeting, and that person would be formalized soon.

73. The defendants did not conduct a proper investigation of plaintiff's complaints and did not comply with the requirements of its own policy by promptly informing plaintiff of its findings and the result of its investigation.

74. Plaintiff asserts there was a civil conspiracy under 42 U.S.C. 1985 and State Law, by Reggie Roe, Steve Brown and Gary Evans, to force plaintiff to resign or be fired in retaliation for plaintiff having reported and complained about the sexual harassment and hostile work environment and for having filed her EEOC claim.

75. On information and belief and hereinabove set forth, plaintiff alleges that the three individual defendants all acted individually, jointly and in concert with each other, under color state law, and the policy, customs and usages of the DeSoto Parish

Police Jury, in a conspiracy and agreement to violate the constitutional rights, privileges and immunities of plaintiff by taking retaliatory actions against her to force her to either quit or resign, which objective was achieved through her constructive discharge.

76. The sexual harassment, hostile work environment and retaliatory actions committed and continued by defendants against plaintiff, as set forth herein, substantially affected the plaintiffs employment, became intolerable to plaintiff and thereafter caused her to terminate same rather than submit to the continuation of such conduct. No reasonable person could be expected to bare such misconduct.

77. Despite the complaints made by plaintiff to the defendant, the DeSoto Parish Police Jury, the defendants failed and refused to terminate the course of the retaliatory conduct and hostile environment created by Reggie Roe, Gary Evans and Steve Brown, thereby condoning and ratifying such illegal acts, transforming them into a condition of plaintiff's continued employment and also thereby rendering such unlawful employment practices to become the policy, custom and practice of the police jury, making it liable to plaintiff under 42 U.S.C. § 1983 and 1981.

78. As a direct consequence of the acts of the defendants hereinabove set forth, plaintiff was deprived of her rights and suffered and continues to suffer much anxiety, emotional distress, pain, suffering and disability, and has been deprived of salary, wages, pension benefits and other benefits, to which she is entitled.

79. As a result of defendants willful and intentional violation of plaintiffs rights as guaranteed by 42 U.S.C. § 1983 and 42 U.S.C. § 2000 (e) plaintiff has been subjected to ridicule, embarrassment, mental anguish and distress, and has sustained substantial damages for which she is entitled to recover from defendants, jointly,



severally or in solido as the court and/or jury may determine.

80. Defendants acted with malice and/or reckless indifference to plaintiffs federally protected constitutional rights

81. Defendant DeSoto Parish Police Jury, its officers, agents and administrators knew or should have known of the prior complaints of sexual harassment and hostile environment by its female employees, but took no action to effectively address and correct the unlawful employment condition; Defendant did not have in place an effective system to prevent such harassment nor to promptly respond to complaints and monitor the workplace for incidents of sexual harassment and retaliation. The police jury did not properly investigate plaintiff's complaint and did not notify plaintiff promptly of the results of any investigation it may have attempted.

82. The DeSoto Parish Police Jury is thus liable to plaintiff for the injury, damages and losses she has incurred and sustained that were caused by the failure to provide a safe work place environment.

83. The sexual harassment, hostile environment and retaliatory conduct was perpetrated and done by the individual defendants herein who were and/or acted as "supervisors" and management agents of the police jury and as hereinabove set forth, for whom the police jury is responsible and liable unto plaintiff.

84. As hereinabove set forth, the individual defendants and the DeSoto Parish Police Jury have violated plaintiffs rights under the Louisiana Employment Discrimination Law ("LEDL") [ which, like Title VII, prohibits discrimination against an individual based upon her sex and is similarly interpreted and enforced] and are liable under state law jointly, severally and in solido, unto plaintiff for the injuries, loss and

damages sustained by her, to be shown at the trial hereof.

**PRAYER**

WHEREFORE, PLAINTIFF prays that summons and citation issue; Defendants be served with the original Complaint and be ordered to answer same within the time allowed by law and after all legal delays and due proceedings had, this Court enter an order or Judgment in plaintiff's favor and against defendants providing as follows:

- (A) That a declaratory Judgment be issued that plaintiff's rights have been violated by defendants as alleged;
- (B) That all issues herein be determined by a jury;
- (C) That plaintiff have and recover from the defendants, jointly and severally, and/or in solido such compensatory damages to which she is entitled, statutory, liquidated, exemplary and punitive damages and such other monetary relief as may be deemed appropriate in such amounts to be determined at trial;
- (D) That plaintiff recover from the defendants, jointly and severally and/or in solido, prejudgment interest to the maximum extent permitted by law;
- (E) That plaintiff recover from the defendants jointly and severally and/or in solido, her costs including expert witnesses fees, together with such other remedies as may be provided by law;
- (F) Grant the Plaintiff her costs and disbursements, including reasonable attorney's fees; and
- (G) That the Court grant such other and further relief as it deems just and proper in the premises.

Plaintiff prays for all other legal and equitable relief to which he is entitled in the

premises.

Respectfully Submitted,

By: /s/ Fred H. Sutherland  
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MAYFIELD**

**PROCESS SERVICE AS FOLLOWS:**

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|----|--|----|--|
| 1. | DeSoto Parish Police Jury<br>Through Parish Administrator<br>Steve Brown<br>101 Franklin Street<br>Mansfield, LA 71052 | 2. | Reggie C. Roe<br>877 Friendship Road<br>Frierson, LA 71027 |
| 3. | Gary V. Evans<br>307 Gibbs Street<br>Mansfield, LA 71052   | 4. | Steve Brown<br>101 Franklin Street<br>Mansfield, LA 71052  |