

DOCKET NO. _____

_____ JUDICIAL DISTRICT COURT IN AND FOR THE PARISH OF
_____, LOUISIANA

VS

PRE-TRIAL MEMORANDUM

MAY IT PLEASE THE COURT:

This case is scheduled to come before Your Honor on a Rule for Contempt filed by _____ and will be heard in front of Your Honor in _____, Louisiana, on the ___ day of _____ 20____, at _____ o'clock ____M.

FACTS AND ARGUMENT:

The court ordered the Plaintiffs and Defendants to refrain from doing anything on their property in the future that would restrict or impede the natural flow of water into and across the natural drainage ditch. (See Judgment, rendered _____, 20____ attached as Exhibit AA@.) The Court further ordered that the defendants remove the temporary drainage ditch they recently dug along the Northern portion of the _____/_____ property which parallels said natural drain, as shown on said plat of survey, from point A to point B.

Since that time, _____ has failed to close in the temporary drainage ditch that exists on the Northern part of his property from point C to point D, more or less, on above-referenced survey. _____, however, has complied with the court=s order by filling in the temporary drainage ditch in front of his property from point A to point C, more or less, as per said survey.

Also, _____ has filled in the previously existing drainage which drained _____'s property into the natural drainage ditch. This was a direct violation of the Judgment, and therefore, he should be held in Contempt of Court for violation of the court order. Furthermore, _____ should be held in violation for Contempt of Court by directly refusing to fill in the temporary drainage ditch on the northern part of his property.

Furthermore, _____ blocked up the natural drainage ditch in a manner that would prevent the water from flowing off the _____ property onto the _____ property, because the flow of the water is from West to East. As a result, he

is also in direct violation of the Court Order and should be held in Contempt of Court.

Respectfully Submitted,

_____, LA _____

(____) _____

La. Bar Roll No. _____

Attorney for _____