

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

, BY AND THROUGH ,
, AND , A MAJORITY OF
THE BOARD OF DEACONS

VS.

COMPLAINT FOR INJUNCTION

COMES NOW the Plaintiff, , and are represents the following:

1.

(a) is an unincorporated association located on , , County, Mississippi.

, , and are each adult resident citizens of County, Mississippi, and constitute a majority of the Board of Deacons of .

(b) is an adult resident citizen of the Judicial District of County, Mississippi and may be served at his/her residence, , , Mississippi.

2.

For a number of years, Rev. has been the Pastor of , and has rendered pastoral services in County, Mississippi.

3.

On , 20 , pursuant to proper notice, a special meeting of the Board of Deacons of were convened. At said meeting a majority of the Board of Deacons voted to recommend to the membership of that Rev. be immediately terminated as Pastor of said Church.

4.

On , 20 , pursuant to proper notice, a special meeting of the members of were convened. At said meeting, a majority of the members in attendance voted for the immediate termination of Rev. as Pastor of said church.

5.

On _____, 20____ a letter were transmitted to Rev. _____ advising him/her of his/her termination as Pastor.

6.

Notwithstanding the fact that Rev. _____ had actual notice of his/her termination, Rev. _____ appeared at _____ in _____ County, Mississippi, on _____, _____, 20____, and conducted services. Said conduct was willful, wanton and malicious and in direct violation of the mandates of the Board of Deacons and members of _____.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that on final hearing hereof, that this Court will enter its Judgment:

1. Enjoining Rev. _____ from entering on the premises of _____ and enjoining him/her from acting in any pastoral capacity for said church.

2. Awarding Plaintiff reasonable attorney's fees, litigation expenses and court costs.

Plaintiff prays for general relief.

Respectfully submitted, this _____ day of _____, 20____.
