

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

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

VS.

ANSWER TO COMPLAINT FOR INJUNCTION

COMES NOW and in answer to the Complaint for Injunction against him/her, answers as follows, to-wit:

1. The Defendant admits that is an unincorporated association located on , County, Mississippi. The Defendant denies that , , and are a majority of the Board of Deacons of , but admits that they are adult resident citizens of County, Mississippi. The Defendant admits subparagraph "B" of paragraph 1 of the Complaint.

2. Admitted.

3. Denied.

4. Denied.

5. The Defendant admits that he/she received a letter advising him/her of his/her termination as Pastor. However, the Defendant denies that the letter constituted a notice from a majority of the congregation of the to terminate the Defendant as Pastor of the Church. The Defendant denies that the letter has any validity whatsoever.

6. The Defendant denies that he/she ever had any actual notice of his/her lawful termination. He/She admits that he/she appeared in the Church on , , 20 , and conducted services. The Defendant denies that such conduct was in direct violation of the mandates of the Board of Deacons and members of .

PRAYER FOR RELIEF: The Defendant denies that the Plaintiffs should receive any relief as a result of their "prayer for relief". The Defendant denies that the Plaintiffs are entitled to any relief whatsoever at the hands of this Court.

MOTION TO DISMISS

COMES NOW _____ and moves the Court to dismiss the Complaint for Injunction filed in the within cause by the Plaintiffs, and would affirmatively show unto the Court that the Plaintiffs have all been dismissed from the Board of Deacons of the _____ of _____, Mississippi, on _____, 20____, a true and correct copy of such dismissal and notice being attached hereto as Exhibit "A". The Plaintiffs do not have any authority whatsoever to bring a suit against the Defendant on behalf of the _____, and they have no "Minutes of the Meetings" of the Church, nor do they have any authorization from the majority of the congregation of the _____ to terminate the Pastor, _____.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Complaint filed in the within cause be dismissed at the cost of Plaintiffs.

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