

ROBERT BURNS

NUMBER 603.248 DOCKET: 24

19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

ANNA DOW

STATE OF LOUISIANA

AMENDMENTS TO MORANDUM IN OPPOSITION TO SPECIAL MOTION TO STRIKE OR, IN THE ALTERNATIVE, AN EXCEPTION OF NO CAUSE OF ACTION FILED BY PLAINTIFF ON SEPTEMBER 2, 2011

NOW UNTO COURT comes Plaintiff, Robert Edwin Burns, in proper person, who submits to this Honorable Court that he wishes to incorporate the following technical amendments to his Memorandum in Opposition to Defendant’s Special Motion to Strike or, in the Alternative, an Exception of No Cause of Action which is scheduled for hearing on Monday, September 26, 2011 at 9:30 a.m.:

Page 2, line 3:

Insert the word “time” after the word “the” and before the word “she,” making it read “...and was aware of it at the **time** she considered.....”

Page 2, line 4:

Insert the following sentences after the word “petition”: “Furthermore, Defendant Dow herself acted irresponsibly regarding Rep. Damon Baldone when she uttered the following quote regarding him, as reflected on audio tape, at the May 17, 2010 LALB meeting: “He doesn’t like auctioneers, and he thinks you’re all crooks.” In making such a reckless remark, which was **particularly** inappropriate for Defendant Dow to make of a prospective complainant to the LALB, Ms. Dow demonstrated her lack of objectivity regarding the nature of Ms. Bonnette’s complaint, demonstrated her bias toward proceeding with Ms. Bonnette’s scurrilous accusations irrespective of any facts, and revealed her own disdain for Rep. Baldone just as Ms. Bonnette had done openly at the Legislative Hearing of May 18, 2010.

Page 2, line 9:

Change “2011” to “2010” so that the sentence reads, “contacted Plaintiff on July 26, **2010**.....”

19TH JUDICIAL DISTRICT COURT
EAST BATON ROUGE, LOUISIANA
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CLERK OF COURT PARISH OF EAST BATON ROUGE

Page 2, line 16:

Delete the word “by” so that the sentence reads, “punishable only as a misdemeanor.....”

Page 3, line 1:

Insert the following sentence after the word “so”: In fact, while attempting to read Exhibit P-5 into the record, Petitioner was repeatedly interrupted by audience member and auctioneer Terry Shirley, who is a friend of then-Chairman James Kenneth Comer and who sat right next to Plaintiff at the LALB table at the meeting of August 2, 2010, who said, during his last interruption of Petitioner, as reflected on the audio of the meeting: “Robert, you want a hearing to properly defend yourself, and if you then want to file suit against the Board, then you do that,” to which then-Chairman Comer said, “Exactly.”

Page 5, last line:

Insert a “)” (i.e. close-parenthesis) after the word “meeting” to read “2009 LALB meeting”).

Page 8, line 14:

Replace the word “she” with the words “her employment relationship” to read, “and Director and that **her employment relationship** wasn’t terminated.....”

Respectfully Submitted,

Robert Edwin Burns, in proper person
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Certificate of Service:

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 6th day of September 2011.

