



Gov. Jindal contacted - EMERGENCY INJUNCTIVE RELIEF for SUSAN HILL

Wednesday, August 20, 2008 10:24 PM

From: "S H"

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EMERGENCY INJUNCTIVE RELIEF - SUSAN HILL.pdf (58KB), SCAN0070.JPG (1645KB)

Because I have not yet been able to stop the deliberate indifference of my constitutional rights by the misconduct state employees and official through any measures I have tried to take so far, I have been forced to meet with police yesterday and the media today.

I have exposed the illegal extortion of me by Kirk Rhinehart, the bad faith investigations by Mark Falcon, the illegal discrimination, the illegal retaliation, the malicious false accusations, and many more claims that has caused me harm since 2004 at DNR. My life and my daughter's life has been destroyed by the deliberate indifference to my Constitutional rights by DNR state employees and officials.

I spend time at the television station detailing the extortion, harassment, hostile work environment, intimidation, threats, defamation, etc. I have subjected to during my employment at DNR. I gave them copies of evidentiary documents and federal lawsuit I filed. They have contacted Gov. Bobby Jindal and provided these documents to him and Emergency Injunctive Relief (copy attached).

I am immediately demanding the terms of Emergency Injunctive Relief, the dismissal of all the false complaints and pre-termination notice; other demands for relief will follow.

By copy of this email, I am requesting an extension of whatever action the Civil Service Appeal necessitates until Gov. Bobby Jindal hopefully takes action to stop the state-created danger my daughter and I have been enduring.

I have suffered such severe harm by defendants misconduct and I have been non-functional or barely functional because of their actions. I am unable understand the bad faith retaliatory and harassing processes I have been subjected to now in the State Civil Service system. My salary has been illegally withheld and I have been prevented from being able to hire an attorney. I am so horrified at the malicious persecution of me.

I am hopeful that Gov. Bobby Jindal will demand that this bad faith discipline and malicious pre-termination be dismissed immediately and that he will immediately provide emergency injunctive relief for the ongoing harm to me and my daughter.

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF LOUISIANA**

SUSAN HILL,

et al.

CIVIL ACTION

Plaintiffs,

v.

BOBBY JINDAL, Governor of the State of
Louisiana, in his official capacity,

et al.

NO. 08-426-RET-DLD

Defendants.

MOTION FOR EX PARTE EMERGENCY ORDER

Petitioner, SUSAN HILL, has filed an Ex Parte Motion for Emergency Injunctive Relief to be immediately placed on Special Paid Leave from her position as a Coastal Resources Scientist Supervisor with the Louisiana Department of Natural Resources with no change in status of all the accompanying salary, benefits, and conditions of her position for a period of time until all her legal claims related to the unconstitutional deprivation of her rights can be discovered and resolved.

Susan Hill made requests for use of her earned annual leave. Karim Belhadjali rejected all her requests and she was placed on leave without pay.

In addition, Susan Hill requests to be immediately paid her back wages which were withheld from her. Susan Hill requests that her health insurance and life insurance and all other terms and conditions of her employment be returned to how they were before this deprivation of her First Amendment, Fourteenth Amendment and other constitutional rights. Defendants misconduct has prevented her from being able to understand, know, or identify my claims and harms suffered.

LEGAL STANDARD

Plaintiff must prove four pre-requisites to be entitled to the extraordinary relief of a preliminary injunction: (1) a substantial likelihood of success on the merits; (2) a substantial threat of immediate and irreparable harm, for which they have no adequate remedy at law; (3) that greater injury will result from denying the preliminary injunction than from its being granted; and (4) that a preliminary injunction will not disserve the public interest. *Canal Author. v. Callaway*, 489 F. 2d 567, 572 (5th Cir. 1974) (en banc).

PLAINTIFF MEETS THE LEGAL STANDARD FOR A PRELIMINARY INJUNCTION

First, Plaintiff has established a substantial likelihood of success on the merits. The documents that are an appendix to this motion clearly delineate a timeline of plaintiff engaging in protected activity and suffering retaliation because of objections to illegal discrimination and other illegal activities. Plaintiff was extorted by Kirk Rhinehart for a period of time and defendants failed to protect her subsequent to the grievance process she was put through. Defendants created more danger for her by leaving her under the supervision and control of all the individuals she had lodged complaints against.

Second, Plaintiff has been deprived of her salary for nearly a month. She has been unable to secure the services of an attorney because she does not have the funds to pay a retainer fee. She has had to procede pro se at this time and try to figure out all the Constitutional violations that were inflicted upon her. She was unable to pay her daughter's college tuition when it was due. She has cancer and must have health insurance for herself and her daughter. Susan Hill has suffered irreparable harm since 2004 because of defendants and she continues to suffer irreparable harm.

Third, Plaintiff faces termination if she does not reply by today, August 20, 2008 and plaintiff will suffer even further harm.

Fourth, the public interest of Louisiana would be best served by state officials and employees following the laws and not acting with deliberate indifference to its citizen's constitutional rights. Plaintiff has an imminent threatened injury with the proposed deprivation of her property right to continued employment.

Respectfully submitted,

By: _____
Plaintiff, SUSAN HILL, Pro Se
P.O. Box 615
Brusly, Louisiana 70719

COVER SHEET – APPEAL TO THE STATE CIVIL SERVICE COMMISSION 5/15/03
(Please type or print legibly)

NAME: Susan Hill

Address: P.O. Box 615
Brusly, LA 70719

Work phone: _____

Home phone: _____

Employee #: _____

1. What action are you appealing?

"Reduction in Pay" with associated "Pre-Deprivation Notice" and "Letter of Counseling" among other actions, defendants' misconduct has prevented me from being able to understand, know, or identify the extent of my claims and harms suffered

2. What state agency took the action you are appealing?

Louisiana Department of Natural Resources

3. What is your status? ☒ permanent ☐ probational ☐ provisional
☐ job appointee ☐ restricted ☐ unclassified

4. Did you receive written notice of the action? Yes ☒ No _____

5. If so, when? some documents attached A copy of the notice must be attached. If not, how and when did you learn about the action?

Defendants' misconduct has prevented me from being able to understand, know, or identify the extent of my claims and harms suffered

6. Why, generally, are you appealing the action?

Retaliation for prior complaints, intimidation, defamation, abuse of process of Louisiana Civil Service Rules among other abuses of process, bad faith "complaint" about me by Maury Chatellier with corresponding bad faith "investigation" of me by lawyer Mark Falcon, detrimental reliance, material misrepresentations, false claims of statements purportedly made by me, bad faith "Letter of Counseling" and bad faith "Pre-Deprivation Notice" which were both handed to me at the same time concern same circumstances, David Fruge provided me with only one (1) business day to respond in writing (yet a Friday, my regular day off so not in the office and therefore, I had no access to records or files) to respond to "Pre-Deprivation Notice", bad faith "Pre-Deprivation Notice" as the severe "discipline" was already decided and stated thereby exposing further abuse of process and clearly indicating a condition of futility imposed on me and any response I would provide, rights' violations by subterfuge and by other means including failure to notice Civil Service mandates as specified in Chapter 12 – 12.8, defendants' misconduct has prevented me from being able to understand, know, or identify the extent of my claims and harms suffered

NOTE: If you are a permanent employee appealing a disciplinary action or removal, use separate sheets to respond to the allegations against you. If you are not a permanent employee or you are appealing anything other than a disciplinary action or removal, you *only* have a right to appeal if the agency discriminated against you or violated the Civil Service Article or a Civil Service Rule. To be heard on these claims, you *must* plead, in detail, facts to support your conclusions. See Civil Service Rule 13.11(d). Use separate sheets to provide this detail.

7. What relief are you seeking?

Immediate restoration of my pay among other forms of relief, defendants' misconduct has prevented me from being able to understand, know, or identify the extent of my claims and harms suffered

8. If you are successful in this appeal, will someone else be adversely affected? If so, provide their names and addresses and explain how they will be adversely affected.

Susan Hill
(Signature of employee or attorney)

Attorneys, please attach a letter of enrollment with your address, phone and fax numbers.