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FILE FOR RECORD
2010 OCT 21 PM 3:35
Deputy Clerk
PARISH OF JEFFERSON, LA

24TH JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON

STATE OF LOUISIANA

NUMBER 693-702

DIVISION **CODEF**

ANNE MARIE VANDENWEGHE

VERSUS

THE PARISH OF JEFFERSON; STEVE THERIOT, IN HIS CAPACITY AS CHIEF ADMINISTRATIVE OFFICER; EULA LOPEZ, IN HER CAPACITY AS CHIEF CUSTODIAN OF PUBLIC RECORDS FOR THE PARISH OF JEFFERSON; AND, GREG GIANGROSSO IN HIS CAPACITY AS ASSISTANT PARISH ATTORNEY AND AGENT FOR CUSTODIAN OF PUBLIC RECORDS FOR THE PARISH OF JEFFERSON

FILED: _____ DEPUTY CLERK

NAMED DEFENDANTS' DECLINATORY, DILATORY AND PEREMPTORY EXCEPTIONS TO PETITION FOR WRIT OF MANDAMUS

NOW INTO COURT, through undersigned counsel, come Named Defendants, the Parish of Jefferson ("JEFFERSON PARISH"); Steve Theriot, sued and named in his capacity as Chief Administrative Officer ("THERIOT"); Eula Lopez, sued and named in her capacity as Chief Custodian of Public Records for the Parish of Jefferson ("LOPEZ"); and Greg Giangrosso, sued and named in his capacity as Assistant Parish Attorney and Agent for Custodian of Public Records for the Parish of Jefferson ("GIANGROSSO") (collectively "Named Defendants"), and without waiving any rights, objections, privileges, defenses or other exceptions, and pursuant to LA. CODE. CIV. P. ART. 925(A), 926(A), and 927(A), file these declinatory (lack of jurisdiction over the person), dilatory (unauthorized use of summary proceedings), and peremptory (no right of action and no cause of action) exceptions ("EXCEPTIONS") to Petitioner's, Ann Marie Vandenberghe ("Petitioner"), Petition for Writ of Mandamus ("WRIT OF MANDAMUS"). The WRIT OF MANDAMUS should be dismissed pursuant to the exceptions for the following reasons: (1) THE WRIT OF MANDAMUS is procedurally improper; (2) Petitioner has no remedy afforded by law; and (3) Petitioner has no right to relief via the WRIT OF MANDAMUS, as set forth in the attached Memorandum in Support of Exceptions. Accordingly, after due proceedings are held, Defendants pray that these Exceptions be maintained, that the WRIT OF MANDAMUS be dismissed with prejudice, and that the costs of these proceedings be taxed against Petitioner.

IMAGED OCT 23 '10 EB

Respectfully submitted,

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THE PARISH OF JEFFERSON; AND,
GREG GIANGROSSO IN HIS CAPACITY
AS ASSISTANT PARISH ATTORNEY AND
AGENT FOR CUSTODIAN OF PUBLIC
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JEFFERSON**

CERTIFICATE OF SERVICE

I hereby certify that on this the 21st day of October, 2010, a copy of the foregoing pleading was served upon Plaintiff via hand delivery and U.S. Mail pursuant to La. Code Civ. Proc. Art. 2594.



IMAGED OCT 27 '10