

**IN THE CHANCERY COURT OF HARRISON COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

**IN THE MATTER OF THE ENLARGING,
EXTENDING, AND DEFINING THE CORPORATE
LIMITS AND BOUNDARIES OF THE CITY
OF PASS CHRISTIAN, HARRISON COUNTY, MISSISSIPPI**

CITY OF PASS CHRISTIAN, MISSISSIPPI

PLAINTIFF

VS.

CAUSE NO. 24-2015(1)

CITY OF BAY ST. LOUIS, MISSISSIPPI

DEFENDANT

**CITY OF BAY ST. LOUIS, MISSISSIPPI'S RESPONSE TO COMPLAINT IN THE
NATURE OF A PETITION FOR THE RATIFICATION, APPROVAL, AND
CONFIRMATION OF AN ORDINANCE ENLARGING, EXTENDING, AND DEFINING
THE CORPORATE LIMITS AND BOUNDARIES
OF THE CITY OF PASS CHRISTIAN, HARRISON COUNTY, MISSISSIPPI**

COMES NOW, Defendant, City of Bay St. Louis, Mississippi (hereinafter "Bay St. Louis), by and through counsel of record, Butler Snow LLP, and files this Response to Complaint in the Nature of Petition for the Ratification, Approval, and Confirmation of an Ordinance Enlarging, Extending, and Defining the Corporate Limits and Boundaries of the City of Pass Christian, Harrison County, Mississippi (hereinafter "Complaint"), and in support thereof, shows unto the Court as follows:

- 1) Bay St. Louis does not deny the allegations of the Complaint, and after investigation, does not have any objection to the relief requested by the City of Pass Christian.
- 2) As such, Bay St. Louis hereby waives any and all objections to the relief requested in the Complaint.

3) Bay St. Louis consents to a hearing on Plaintiff's prayer for relief at any time, without further notice.

4) Plaintiff's prayer for relief should be determined by this Honorable Court in accordance with relevant law.

5) Finally, Bay St. Louis hereby requests an Order from this Honorable Court relieving it from the responsibility to participate in future proceedings in this matter.

WHEREFORE, PREMISES CONSIDERED, the City of Bay St. Louis prays this Honorable Court take any and all actions deemed appropriate in its discretion and dismiss the City and its counsel from any future participation in this matter.

RESPECTFULLY SUBMITTED, THIS the ____ day of _____, 2024.

Heather L. Smith

OF COUNSEL:

Heather L. Smith (MS Bar No. 103981)
BUTLER SNOW LLP
1300 25th Avenue, Suite 204
Gulfport, Mississippi 39501

Attorney for City of Bay St. Louis, Mississippi

CERTIFICATE OF SERVICE

I, Heather L. Smith, do hereby certify that on this day, a true and correct copy of the foregoing was filed electronically using the MEC filing system, which sent notification of such filing to all registered attorneys of record.

This the ____ day of _____, 2024.

Heather L. Smith