

IN THE CHANCERY COURT OF LEFLORE COUNTY, MISSISSIPPI

**ALIX SANDERS AS FATHER AND
NEXT FRIEND OF NEYSHA SANDERS**

PLAINTIFFS

VS.

CIVIL ACTION NO: G11-0143

**GREENWOOD POLICE DEPARTMENT AND
MISSISSIPPI STATE CRIME LAB**

DEFENDANTS

VERIFIED COMPLAINT FOR INJUNCTIVE AND RELATED RELIEF

Comes Now Alix Sanders, father and next friend of his daughter, Neysha Sanders, by and through undersigned counsel, and file their Verified Complaint for Injunctive and Related Relief against the named Defendants and for cause would show to the Court the following facts, to wit:

1. That on November 8, 2011, Plaintiff Neysha Sanders had a car accident within the City limits of Greenwood, Mississippi. Said Plaintiff was injured and was air lifted to a hospital in Jackson, Mississippi. She is in no position to sign this complaint or protect her interest in this matter. Her father is therefore representing her interest.

2. After the accident, members of the Greenwood Police Department without a first obtaining a search warrant, searched her purse and took medication from her purse and are now taking it to the Mississippi Crime Lab to be analysed.

3. Plaintiff Neysha Sanders did not consent to said search and the search thereof by the Greenwood Police Department constitutes a violation of her constitutional rights, including but not limited to, her right to privacy and her right against illegal search and seizure.

FILED

NOV - 8 2011

SAM ABRAHAM, CHANCERY CLERK

BY S. Abraham D.C.

4. That the analysis of said medication by the Mississippi Crime Lab would also violate her constitutional rights.

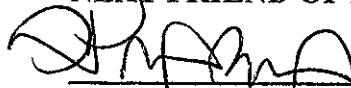
5. If these Defendants are allowed to proceed with the search and analysis of the content of her purse the same would cause Plaintiff irreparable harm in that Defendants would have violated Plaintiff's right to privacy and other constitutional rights..

6. On a hearing on the merit Plaintiff is likely to prevail on the merits of her claim.

WHEREFORE, premises considered, Plaintiffs move the Court for a Temporary Restraining Order and a Temporary Injunction and other related relief enjoining, preventing and restraining Defendants or anyone acting on their behalf, from taking the content of Plaintiff's purse to the Mississippi Crime lab for analysis. Further, Plaintiff moves this Court to grant a Temporary Injunction without notice in light of the immediate and irreparable harm which will result to Plaintiffs. Further Plaintiffs move the Court to set this matter for a preliminary hearing and after such hearing enter its Order granting a Preliminary Injunction. Plaintiffs pray for such other general and additional relief the Court deems just and equitable.

RESPECTFULLY SUBMITTED,

**ALIX SANDERS, FATHER AND
NEXT FRIEND OF NEYSHA SANDERS**



FREDRICK B. CLARK

P. O. BOX 10027

GREENWOOD, MISSISSIPPI 38930

662-455-1281

VERIFICATION BY PLAINTIFF

STATE OF MISSISSIPPI

COUNTY OF LEFLORE

I, **Alix Sanders**, father and Next Friend of **Neysha Sanders**, after being duly sworn in accordance with the law, make oath that the matters and things alleged in the foregoing **Verified Complaint for Injunctive and Related Relief** are true and correct to the best of my knowledge, information and belief.

Alix Sanders

**Alix Sanders, father and Next Friend
Of Neysha Sanders**

SWORN TO AND SUBSCRIBED before me, this the 8th day of November,

2011.



Sam Abraham, Clerk

By: [Signature] DC
NOTARY PUBLIC

MY COMMISSION EXPIRES:

1/1/2012