

**UNITED STATES DISTRICT COURT  
FOR SOUTHERN DISTRICT OF MISSISSIPPI  
HATTIESBURG DIVISION**

LIGHTHOUSE RESCUE MISSION, INC., a  
Mississippi Non-profit Corporation,

Plaintiff,

Hon: Keith Starrett  
Magistrate Judge Michael T. Parker  
Case No.: 2:12-CV-00184-KS-MTP

v.

THE CITY OF HATTIESBURG,  
MISSISSIPPI, a Mississippi Municipal Body,

Defendant.

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**Plaintiff's Motion for Summary Judgment  
Pursuant to Fed. R. Civ. Pro. 56(c)**

Now Comes Plaintiff, Lighthouse Rescue Mission, Inc., by and through its attorneys Dalton & Tomich, plc, and respectfully requests that this court enter an Order granting its Motion for Summary Judgment on Counts I and II of its First Amended Complaint and to set this case for trial on damages. In support of this Motion, Plaintiff relies upon the attached Brief in Support of Summary Judgment, Declaration of Kenneth Thronson and Exhibits.

Respectfully submitted,

**Dalton & Tomich plc**

/Daniel P. Dalton

By: Daniel P. Dalton

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Dated: August 15, 2013

**Certificate of Service**

I HEREBY CERTIFY that I have on this 15<sup>th</sup> day of August, 2013, served a copy of the foregoing on counsel for all parties to this proceeding by operation of the Court's CM/ECF system.

/s/ Daniel P. Dalton  
Attorney for Plaintiff  
Lighthouse Rescue Mission