

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

SEP 07 2017

JAMES W. MCCORMACK, CLERK
By: *Rockell*
DEP. CLERK

Mitchell L. Null, Jr.,
Plaintiff,

v.

CASE NO. 4:17-cv-561 BRW-PSH
Civil Action

Tim Ryals, Sheriff, et al
Defendants

PLAINTIFF'S MOTION REQUESTING COURT
TO FREEZE ANY AND ALL PROPERTY
AND ASSETS OF THE DEFENDANTS

1. The Plaintiff, Mitchell L. Null, Jr., being in a pro se manner, is respectfully presenting Plaintiff's Motion Requesting Court To Freeze Any And All Property And Assets Of The Defendants in this matter. The Plaintiff can show good cause for the need of each of the Defendants property and assets to be frozen immediately by a direct and specific order by this Honorable Court. The Plaintiff does not have any access to a law library and therefore is unable to state the actual legal terms of this present request. As such, the Plaintiff must depend on the Court to determine the proper remedy for Plaintiff's

intentions of this request. Plaintiffs request is based upon the following facts.

FACTS FOR THE COURT TO CONSIDER

2. Each of the Defendants named within the Plaintiff's Civil Complaint are employed at the Faulkner County Jail and or under the authority of Tim Ryals, Sheriff of Faulkner County. Each of the Defendants are fully aware of the fact that Plaintiff is in fact seeking both monetary and punitive damages from each Defendant. The Defendants being aware of such have property of actual values that can otherwise be sold or transferred into other people's names to prevent having the necessary funds to pay any Court ordered damages if the Defendants are found guilty of the claims stated against them in the Civil Complaint.

3. The Plaintiff is not able to research the proper procedures for the Court to take to freeze all property and assets of each of the Defendants in this matter. Plaintiff is requesting that any and all property of each Defendant such as real property, land, homes, real estate, business or rental properties be held or froze to prevent sale or transfer of any such property until

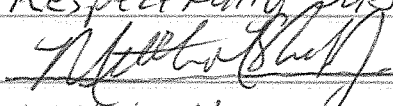
after the end results of this case comes to pass. This includes but not limited to, any banking accounts, checking accounts, savings accounts, debit card accounts, credit card accounts or private stocks, bonds or investments of each of the named Defendants herein.

4. The Plaintiff is aware that some of the Defendants may own recreational property such as motor homes, RV's, four wheelers, boats, jet skis or any other similar property is to be frozen as well.

5. The Plaintiff has raised valid claims of different types of Civil and Constitutional violations, has presented claims that have resulted in actual damages either medical or long term mental care that will be necessary as a direct result of the Defendants actions. Because of the Plaintiff's future cost for medical or mental care that the Defendants may be financially liable for, it is in the best interest of the Plaintiff as well as the Court to fully assure that the Defendants "can not" sell, trade or transfer any funds or property until the final results of this case is determined by the Court.

6. The Plaintiff feels sure that the Court has an understanding of what the Plaintiff is requesting at this time although the Plaintiff may not have cited the correct legal terms of such request. As such, the Plaintiff prays that this Honorable Court will grant the Plaintiff the full amount of relief due to him at this time.


Dated this 5th day of
September, 2017

Respectfully Submitted

Mitchell L. Bull, Jr.

DECLARATION

I, Mitchell L. Bull, Jr., do hereby state under the penalty of perjury that the foregoing is true and correct.

Dated this 5th day of
September, 2017.


Mitchell L. Bull, Jr.
Faulkner County Jail
801 Locust Street
Cowley, Ar. 72034