

1ST JUDICIAL DISTRICT COURT FOR THE PARISH OF CADDO
STATE OF LOUISIANA

NO.: LE 2600 B DIVISION " "

**ARTILIOUS SAXTON & CLEVELAND SAXTON,
individually and on behalf of their deceased mother, MILDRED CARTER-RAWLS**

versus

CITY OF SHREVEPORT and SHREVEPORT FIRE DEPARTMENT

FILED: _____
DEPUTY CLERK

PETITION FOR DAMAGES

NOW COME, through undersigned counsel, Plaintiffs, Artilious Saxton and Cleveland Saxton, individually and on behalf of their deceased mother, Mildred Carter-Rawls, who for their Petition for Damages respectfully aver:

1.

Plaintiff, Artilious Saxton, is a person of the full age of majority and a resident of Montgomery County, State of Texas. Mr. Saxton is the natural son of Mildred Carter-Rawls (deceased).

2.

Plaintiff, Cleveland Saxton, is a person of the full age of majority and a resident of the Parish of Bossier, State of Louisiana. Mr. Saxton is the natural son of Mildred Carter-Rawls (deceased).

3.

Plaintiffs are the proper parties to bring a cause of action both individually, and on behalf of their deceased mother, Mildred Carter-Rawls, pursuant to Louisiana Civil Code articles 2315.1 and 2315.2:

4.

Named Defendants are:

- a) The City of Shreveport, a municipality and political subdivision organized under the laws of the State of Louisiana with the capacity to sue and be sued; and
- b) The City of Shreveport Fire Department, a juridical entity of the defendant, City of Shreveport, and a political subdivision of the State of Louisiana.

5.

This Court has jurisdiction pursuant to article 2 of the Louisiana Code of Civil Procedure. Venue is proper in this Court as incident occurred and Plaintiffs' damages were sustained in the Parish of Caddo, State of Louisiana.

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6.

On or about April 6, 2025, decedent, Mildred Carter-Rawls, was with her young granddaughters at her home located at 2441 Kemp Lane, Shreveport, Louisiana, when her home caught fire. The mother of the two young children called 9-1-1 at approximately 6:37 a.m. to report that her children were with

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their grandmother inside of the house and that her young daughter had called her stating that the house was on fire. The 9-1-1 operator conveyed this information to Shreveport Fire Department (SFD) communication and transferred the call to SFD dispatch.

7.

At approximately 6:38 a.m., SFD dispatch broadcast an alert to selected stations to respond to a “possible” house fire. At this time SFD failed to report that multiple people were inside the burning home. SFD Engines 6 and 8 were dispatched to the reported “possible” house fire at 2441 Kemp Lane.

8.

While these engines were boarding and leaving their respective stations, SFD dispatch entered a written message into the “mobile display termination” (MTD) reporting for the first time that people were inside the home. Upon information and belief, the responding engine crews did not review the MTD alert. Upon information and belief, SFD dispatch did not broadcast by radio or other means to the responding engine crews that people were inside the burning home.

9.

SFD Captain Devin Kennedy was in command of SFD Engine 6, and at approximately 6:43 a.m. Engine 6 was the first engine to arrive at 2441 Kemp Street. At all material times, Captain Kennedy was acting in the course and scope of his employment with the SFD and/or the City of Shreveport.

10.

Upon their arrival, SFD Engine 6 found smoke and flames coming from the “A” side of the home and began efforts to attack and suppress the fire. SFD Engine 4 arrived shortly thereafter. No search and rescue efforts were made by SFD crews to evacuate the persons inside the burning home. SFD also made no efforts to ascertain whether anyone was inside the burning home, despite vehicles parked in the home’s driveway and the 911 call reporting multiple people inside the burning home.

11.

After the SFD crews had mostly suppressed the fire, Engine 8 arrived on scene and verbally relayed to onsite SFD personnel the MDT message that persons were inside the home. At this time SFD crews entered the home and first began search and rescue efforts, but they were too late. Mildred Carter-Rawls and her granddaughters died in the burning house. Upon information and belief, Captain Kennedy was terminated and/or retired involuntarily because of his failure to follow search and rescue protocols.

12.

Defendants are liable, negligent, and at fault for directly and proximately causing the survival and wrongful death of Mildred Carter-Rawls, in the following non-exclusive particulars:

- 1) Failing to perform search and rescue efforts;
- 2) Failing to perform search and rescue efforts timely;
- 3) Failing to follow search and rescue protocols and procedures;

- 4) Failing to communicate the known presence of persons inside the burning home;
- 5) Failing to implement, maintain, and ensure effective communication between dispatch and responding engine crews;
- 6) Failing to implement proper search and rescue protocols and procedures;
- 7) Failing to conduct an assessment for the presence of persons inside the burning home;
- 8) Failing to properly train SFD personnel;
- 9) Failing to do what they should have done; and
- 10) All other acts of negligence that may become known prior to trial.

13.

Plaintiffs have been damaged as a result of Defendants' fault and negligence. Plaintiffs bring an action for damages and wrongful death under Louisiana Civil Code articles 2315, 2316, and 2315.2, arising out of the wrongful death of Mildred Carter-Rawls, including but not limited to: funeral and burial expenses, medical expenses, pain and suffering, mental anguish, loss of love and affection, loss of a chance of survival, and all other general and special damages that have resulted from the wrongful death of Mildred Carter-Rawls.

14.

Plaintiffs also bring a survival action under Louisiana Civil Code article 2315.1, arising out of the survival damages of Mildred Carter-Rawls, including but not limited to: physical and mental pain and suffering, mental anguish, fear of impending death, loss of enjoyment of life, and all other damages that are recoverable in this survival action.

WHEREFORE, Plaintiffs, Artilious Saxton and Cleveland Saxton, individually and on behalf of their deceased mother, Mildred Carter-Rawls, pray that their Petition for Damages be deemed good and sufficient and that Defendants, the City of Shreveport and the City of Shreveport Fire Department, be served and cited with a copy of this Petition for Damages, and that after all due proceedings be had herein, that judgment be entered in favor of Plaintiffs and against Defendants, jointly, severally, and *in solido*, for all reasonable damages, together with all costs of these proceedings, for legal interest from the date of judicial demand until paid, and for all general and equitable relief.

Respectfully submitted:

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PLEASE SERVE:

City of Shreveport
Through the Office of Mayor Tom Arceneaux
505 Travis Street, Suite 200
Shreveport, Louisiana 71101

Shreveport Fire Department
Through Chief Clarence Reese, Jr.
263 North Common
Shreveport, Louisiana 71101

Citation

ARTILIOUS SAXTON ETAL
VS
CITY OF SHREVEPORT ETAL

NO. 662600-B
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: CITY OF SHREVEPORT
THRU HONORABLE TOM ARCENEUX, MAYOR
505 TRAVIS ST STE 200
SHREVEPORT, LA
71101

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YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within TWENTY-ONE (21) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within TWENTY-ONE (21) days, a judgment may be entered against you. Please be aware of Act 174 of the 2021 regular session of the Louisiana Legislature which changed delays for answering. The full text of this bill can be found at <https://legis.la.gov/legis/BillInfo.aspx?i=239989>.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date March 6, 2026.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

JOSEPH PIACUN

Attorney

FILE COPY