

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

ACLU OF TENNESSEE,)	
)	
Intervening Plaintiff,)	
v.)	No. 2:17-cv-02120-JPM-dkv
)	
THE CITY OF MEMPHIS,)	
)	
Defendant.)	

**DEFENDANT'S MOTION FOR EXTENSION OF DEADLINE TO FILE QUARTERLY
SEARCH TERMS**

Defendant, the City of Memphis ("the City"), respectfully moves this Court for a brief extension of time to file this Quarter's "list of all search terms entered into social media collators or otherwise used by MPD officers collecting information on social media while on duty." *See* ECF No. 152, PageID 6289.

Because this Quarter's reporting deadline falls during the week of the local school systems' Fall Break when many officers are on vacation, the City requests a modest extension of one week to that deadline so that it may be sure to collect a complete inventory of search terms used by all the relevant MPD officers.

Therefore, the City respectfully requests that the deadline to submit this Quarter's search terms be extended until October 22, 2019.

Respectfully Submitted,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.

s/ Mark Glover

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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(B), on October 15, 2019, Mark Glover communicated with counsel for Intervening Plaintiff, Thomas Castelli, regarding the relief sought in this motion. Mr. Castelli advised that the Intervening Plaintiff does not oppose this Motion.

s/Mark Glover

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of October 2019, a copy of the attached pleading was filed electronically. Notice of this filing will be served by operation of the Court's electronic filing system to all counsel of record.

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s/ Mark Glover _____