

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

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

MOTION TO SET A HEARING DATE

The Defendant, the City of Memphis ("the City"), respectfully moves the Court to set a hearing date to discuss the issues presented to the Court by the Monitor in his letter of February 28, 2020 (hereafter, "the Monitor's Letter").

In support of this motion, the City states as follows:

1. On February 28, 2020, the City received the Monitor's Letter to the Court explaining that he believed the City has been departing from Sanction 5 of the Court's Opinion and Order.
2. The Monitor recommended that the Court schedule a hearing "to allow the City to explain its departure from Sanction 5 and present its proposed alternatives directly to the Court."
3. The City welcomes that opportunity, and respectfully requests an expedited hearing to discuss these issues with the Court, the Monitor, and the ACLU-TN so that it can ensure that it complies with the Court's Order and sanctions.

Therefore, the City respectfully requests that the Court grant its Motion and set a hearing date as soon as practicable.

Respectfully Submitted,

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

s/ Mark Glover

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of March 2020, 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

Mark Glover

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(B), on March 1, 2020, counsel for the City, Jennie Silk, exchanged emails with Mandy Floyd and Tom Castelli, counsel for Intervening Plaintiff, regarding the relief sought in this motion. Intervening Plaintiff does not oppose the relief sought in this Motion.

s/ Mark Glover

Mark Glover