

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

ELAINE BLANCHARD, KEEDRAN)	
FRANKLIN, PAUL GARNER, and)	
BRADLEY WATKINS,)	
)	
Plaintiffs, (dismissed pursuant to)	
Court Order))	
)	
and)	
)	
ACLU OF TENNESSEE,)	
)	
Intervening Plaintiff,)	
)	
v.)	No.: 2:17-cv-02120-JPM-dkv
)	
THE CITY OF MEMPHIS,)	
)	
Defendant.)	
)	

MOTION FOR RULE 54(b) CERTIFICATION

COMES NOW the dismissed Plaintiffs, Elaine Blanchard, Keedran Franklin, Paul Garner, and Bradley Watkins (the “Blanchard Plaintiffs”), by and through counsel, pursuant to Rule 54 of the Federal Rules of Civil Procedure, and respectfully move this Court for an Order directing the entry of a final judgment as to the Blanchard Plaintiffs and expressly determining that there is no just reason for delay. In support of its Motion, the Blanchard Plaintiffs rely upon their Memorandum in Support filed contemporaneously herewith.

WHEREFORE, the Blanchard Plaintiffs respectfully request this Court enter an Order directing the entry of a final judgment as to the Blanchard Plaintiffs and expressly determining that there is no just reason for delay.

Respectfully Submitted,

APPERSON CRUMP PLC

s/Bruce S. Kramer
Bruce S. Kramer, Esq., (#7472)
Scott A. Kramer, Esq. (#19462)
Patrick H. Morris, Esq. (#33689)
6070 Poplar Avenue, Sixth Floor
Memphis, TN 38119
Phone: (901) 756-6300
Fax: (901) 757-1296
bkramer@appersoncrump.com
skramer@appersoncrump.com
pmorris@appersoncrump.com

Attorneys for Plaintiffs

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(B), counsel for the Blanchard Plaintiffs, Patrick H. Morris, certifies that on August 2, 2017, all counsel participated in a telephone conference in which the issues in this motion were discussed, that on September 6, 2017, I emailed all counsel for the Defendant City of Memphis, and counsel for the Intervening Plaintiff ACLU-TN in consultation on this motion prior to filing, and that after consultation between the parties to the controversy, they are unable to reach an accord as to all issues.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading is being served via the Court's ECF system, upon the following counsel of record this the 11th day of September, 2017:

Buckner Wellford (#9687)
Thomas L. Parker (#13908)
Jennie V. Silk (#35319)
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone (901) 526-2000
bwellford@bakerdonelson.com
tparker@bakerdonelson.com
jsilk@bakerdonelson.com

Tom Castelli
Legal Director
ACLU Foundation of Tennessee
P.O. Box 120160
Nashville, TN 37212
Telephone (615) 320-7142
tcastelli@aclu-tn.org

s/Bruce Kramer
Bruce S. Kramer