

**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.)

Pursuant to the Court’s August 19, 2020 Order (ECF No. 363), the City is reporting the search terms from every MPD officer in this quarter’s submission. The City ordered the officers who had not previously been required to report search terms to submit all their work-related search terms used during the period from November 1, 2018 through June 30, 2020.

The City also ordered each officer — both those that had previously not been ordered to report their terms, as well as those that had been previously reporting — to submit their work-related search terms used during the dates of July 1, 2020 through September 30, 2020 in a separate submission.

Due to the complexity of creating an efficient process to collect this data from every officer in a manner that protects the highly sensitive data, the City has encountered an unforeseen

delay in its collection efforts. Accordingly, the City seeks a modest extension to the submission deadline.

Therefore, the City respectfully requests that the deadline to submit this quarter's search terms be extended through October 19, 2020.

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

s/ Bruce McMullen

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CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(B), on October 14, 2020, counsel for the City, Jennie Silk, 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 the relief sought in this Motion.

s/Bruce McMullen

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of October 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/ Bruce McMullen _____