

**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.)

**DEFENDANT’S NOTICE REGARDING QUARTERLY SUBMISSION OF SEARCH
TERMS AS HIGHLY SENSITIVE DOCUMENTS**

I. Background

Pursuant to the Court’s October 27, 2018 Opinion and Order the Court imposed certain sanctions on the Defendant, the City of Memphis (“the City”) and ordered compliance by a date certain. (ECF No. 151.)

Under the Order, the Court required, in part, that:

5) The City shall maintain a list of all search terms entered into social media collators or otherwise used by MPD officers collecting information on social media while on duty. This list shall be filed under seal every three months until the Court orders otherwise. The first filing shall be submitted no later than January 14, 2019 and shall reflect all such social media searches conducted from November 1, 2018 through December 31, 2018.

(ECF No. 151, PageID 6275.)

Pursuant to that Sanction, the City has submitted fourteen sets of social search terms used by MPD. (See ECF Nos. 183, 199, 214, 239, 275, 308, 353, 383, 395, 401, 404, 411, 415, and 422.)

On January 22, 2021, the Court entered Administrative Order No. 2021-03,¹ which

¹ On February 3, 2021, the Court vacated Administrative Order No. 2021-03 and replaced it with Administrative Order No. 2021-05.