

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

ELAINE BLANCHARD, KEEDRAN)	
FRANKLIN, PAUL GARNER and BRADLEY)	
WATKINS, (Dismissed per Court Order))	
)	
Plaintiffs,)	
and)	
)	
ACLU OF TENNESSEE, Inc.)	
)	
)	
Intervening Plaintiff,)	
v.)	No. 2:17-cv-02120-jpm-DKV
)	
THE CITY OF MEMPHIS,)	
)	
Defendant.)	

**JOINT MOTION FOR STATUS CONFERENCE AND
MEMORANDUM IN SUPPORT THEREOF**

The remaining Parties to this action, Intervening Plaintiff, ACLU of Tennessee, Inc. ("ACLU-TN"), and Defendant, City of Memphis (the "City"), respectfully request that this Honorable Court conduct a Status Conference at the earliest date available to the Court.

On November 2, 2017, the Court entered the Amended Scheduling Order which is currently in place. Among other things, the Court required the completion of written discovery on January 31, 2018 and the completion of depositions on or before April 28, 2018. The parties completed discovery (subject to motions or supplementation pertaining to that discovery) in accordance with the Scheduling Order.

Counsel for the Parties have consulted and are desirous of exploring the possibility of resolution of the suit by agreement or in the alternative, narrowing the issues in the suit by agreement. The present Amended Scheduling Order calls for the filing of dispositive motions by

May 30, 2018 and contains other deadlines with regard to trial preparation in the very near future.

It is the request of counsel for both Parties that a brief period of consultation and collaboration be allowed before the filing of dispositive motions in order to determine whether issues in the case can be narrowed or, in fact, whether an agreed order for the Courts consideration could be crafted.

WHEREFORE, the Parties jointly move this Court for a status conference to discuss logistics, timing and preferences of the Court with regard to the remaining pre-trial issues in this case.

MEMORANDUM IN SUPPORT OF REQUEST FOR SCHEDULING CONFERENCE

The discovery in this case has been completed, subject to any motions which might be filed seeking to compel or otherwise obtain court rulings on objections. A number of conversations have occurred between counsel for the Parties subsequent to discovery which suggests that a number, if not all of the issues remaining in this litigation, could be significantly narrowed or eliminated by agreement. In view of the cooperation shown to date and the desire to reach agreement on as many issues as possible before trial, the parties request the Court's guidance regarding the time frame necessary to conduct good faith settlement negotiations and the advisability of extending remaining motion deadlines during that process. The parties believe that this request is in the interest of judicial economy and may hasten the expeditious resolution of the litigation.

WHEREFORE, both Parties respectfully request that the Court set a status conference at the earliest available date wherein these issues can be discussed.

RESPECTFULLY SUBMITTED,

s/Thomas H. Castelli
Thomas H. Castelli (#024849)
Mandy Floyd (#31123)
ACLU Foundation of Tennessee
P.O. Box 120160
Nashville, Tennessee 37212
Telephone (615) 320-7142
E-mail: tcastelli@aclu-tn.org
mfloyd@caclu-tn.org

Counsel for Plaintiff

s/ Jennie Vee Silk
Buckner Wellford (#TN 9687)
R. Mark Glover (#TN 6807)
Jennie Vee Silk (#TN 35319)
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: 901.577.2152
Email: bwellford@bakerdonelson.com
mglover@bakerdonelson.com
jsilk@bakerdonelson.com

Counsel for Defendant, The City of Memphis

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of May, 2018, the foregoing will be served this Court's ECF System to:

Thomas H. Castelli
Mandy S. Floyd
ACLU Foundation of Tennessee
P.O. Box 120160
Nashville, Tennessee 37212

s/Jennie Vee Silk