

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

TENNESSEE STATE CONFERENCE OF	)	
THE NAACP et al.,	)	
	)	
Plaintiffs,	)	No. 3:23-cv-00832
	)	
v.	)	JUDGE ELI RICHARDSON
	)	JUDGE ERIC E. MURPHY
WILLIAM B. LEE, et al.,	)	JUDGE BENITA Y. PEARSON
	)	
Defendants.	)	
	)	

**MOTION TO CONTINUE INITIAL CASE MANAGEMENT CONFERENCE**

Counsel for Defendants respectfully request that the Initial Case Management Conference in this matter, currently scheduled for October 27, 2023 at 1:30 p.m. EDT, be reset to the originally scheduled date of October 31, 2023. The October 31<sup>st</sup> conference was scheduled by the Court on August 9, 2023. (ECF No. 13). All parties confirmed their availability for an October 31<sup>st</sup> appearance before the Court during the September status conference. (ECF No. 34 at 38, 56). Co-lead counsel for Defendants, Adam Mortara, indicated the only scheduling conflict he had in late October was the afternoon of October 27<sup>th</sup>. (*Id.* at 56). Counsel for Defendants respectfully request that the Initial Case Management Conference be reset from the afternoon of October 27<sup>th</sup> to the original date of October 31, 2023. Should rescheduling not be possible, co-lead counsel Whitney Hermandorfer will appear for Defendants without Mr. Mortara, with the Court’s permission.

Counsel for Defendants conferred with Counsel for Plaintiffs regarding this motion. Counsel for Plaintiffs are unopposed to the motion but request that the Initial Case Management Conference be rescheduled for a date no later than October 31, 2023. Therefore, should the Court

be unavailable on October 31, 2023, Counsel for Defendants request that the Initial Case Management Conference be rescheduled for October 26<sup>th</sup>, or 30<sup>th</sup>.

Dated: October 3, 2023

ADAM K. MORTARA (BPR# 40089)  
Lawfair LLC  
40 Burton Hills Blvd., Suite 200  
Nashville, TN 37215  
(773) 750-7154  
mortara@lawfairllc.com

Respectfully submitted,

/s/ Ryan Nicole Henry  
RYAN NICOLE HENRY (BPR# 40028)  
Assistant Attorney General  
WHITNEY DOWNS HERMANDORFER  
(BPR# 041054)  
Assistant Solicitor General  
MIRANDA H. JONES (BPR# 036070)  
Senior Assistant Attorney General  
Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, Tennessee 37202  
(615) 532-2935  
ryan.henry@ag.tn.gov  
whitney.hermendorfer@ag.tn.gov  
miranda.jones@ag.tn.gov

***Counsel for Defendants***

**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2023, the undersigned filed the foregoing document via this Court's electronic filing system, which sent notice of such filing to the following counsel of record:

<b>COUNSEL OF RECORD</b>	<b>PARTY REPRESENTED</b>
<p>Phillip F. Cramer Sperling &amp; Slater 150 3<sup>rd</sup> Avenue South, Suite 1100 Nashville, TN 37201 Tel.: 312-224-1512 pcramer@sperling-law.com</p> <p>Jon Greenbaum Ezra D. Rosenberg Pooja Chaudhuri Lawyers' Committee for Civil Rights Under Law 1500 K Street NW, Suite 900 Washington, DC 20005 Tel.: 202-662-8600 jgreenbaum@lawyerscommittee.org erosenberg@lawyerscommittee.org pchaudhuri@lawyerscommittee.org</p> <p>Jeffrey Loperfido Mitchell D. Brown Southern Coalition for Social Justice 1415 West Highway 54, Suite 101 Durham, NC 27707 Tel.: 919-323-3380 jeffloperfido@scsj.org mitchellbrown@scsj.org</p>	<p>Plaintiffs Tennessee State Conference of the NAACP, League of Women Voters of Tennessee, The Equity Alliance, Memphis A. Philip Randolph Institute, African American Clergy Collective of Tennessee, Judy Cummings, Brenda Gilmore, Ophelia Doe, Freda Player, and Ruby Powell-Dennis</p>

George E. Mastoris Michelle D. Tuma Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: 212-294-6700 gmastoris@winston.com mtuma@winston.com	
---	--

/s/ Ryan Nicole Henry  
RYAN NICOLE HENRY (BPR# 040028)  
Assistant Attorney General

*Counsel for Defendants*