

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE;
MISSISSIPPI STATE CONFERENCE OF
THE NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE;
JACKSON CITY BRANCH OF THE
NAACP; DERRICK JOHNSON; FRANK
FIGGERS; CHARLES TAYLOR;
MARKYEL PITTMAN; CHARLES JONES;
and NSOMBI LAMBRIGHT-HAYNES,

Plaintiffs,

v.

TATE REEVES, in his official capacity
as Governor of the State of Mississippi;
SEAN TINDELL, in his official capacity
as Commissioner of Public Safety; BO
LUCKEY, in his official capacity as
Chief of the Mississippi Department of
Public Safety Office of Capitol Police;
MICHAEL K. RANDOLPH, in his
official capacity as Chief Justice of the
Mississippi Supreme Court; and LYNN
FITCH, in her official capacity as
Attorney General of the State of
Mississippi,

Defendants.

Civil Action No. 3:23-cv-272-HTW-LGI

PLAINTIFFS IN *JXN UNDIVIDED COALITION* v. *TINDELL*
MOTION FOR CONSOLIDATION

Pursuant to Federal Rule of Civil Procedure 42(a), Plaintiffs in Civil Action No. 3:23-cv-351-TSL-RPM, *Jxn Undivided Coalition, et al. v. Tindell, et al.*, hereby move for consolidation of their case, filed last week in this Court, with this action. As set forth more fully in the accompanying memorandum, consolidation is appropriate because: (1) the actions are pending in the same judicial district; (2) common parties are involved; (3) there are common questions of law or fact; (4) if the cases are tried separately, a risk of inconsistent adjudications of factual and legal issues would exist; (5) consolidation will conserve judicial resources; (6) consolidation will not result in an unfair advantage; (7) consolidation will reduce the time for resolving the cases; and (8) consolidation will reduce the cost of trying the cases separately.

Based on the foregoing; the exhibits attached to this motion, listed below; and the reasons set forth in Plaintiffs' accompanying memorandum of authorities, Plaintiffs respectfully submit that this action and Civil Action No. 3:23-cv-351-TSL-RPM should be consolidated for all purposes pursuant to Federal Rule 42(a) and Local Rule 42.

Exhibit A: Civil Cover Sheet in *Jxn Undivided Coalition v. Tindell*

Exhibit B: Complaint in *Jxn Undivided Coalition v. Tindell*

Submitted, this 7th day of June, 2023.

/s/ Paloma Wu

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