

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

**HAROLD HARRIS; PASTOR ROBERT
TIPTON, JR.; DELTA SIGMA THETA
SORORITY, INC.; and DESOTO COUNTY
MS NAACP UNIT 5574**

PLAINTIFFS

VS.

CIVIL ACTION NO.: 3:24-CV-00289-GHD-RP

**DESOTO COUNTY, MISSISSIPPI;
DESOTO COUNTY BOARD OF
SUPERVISORS; and DESOTO COUNTY
ELECTION COMMISSION**

DEFENDANTS

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants DeSoto County, Mississippi, DeSoto County Board of Supervisors, and DeSoto County Election Commission (“Defendants”) move for summary judgment pursuant to Federal Rule of Civil Procedure 56.

1. The contemporaneously filed memorandum in support sets forth the grounds for the requested relief.

2. In addition to the memorandum, Defendants offer the following exhibits in support:
Exhibit “A” – Plaintiff, Harold Harris’ Responses and Objections to Defendants’ First Set of Interrogatories;

Exhibit “B” – Deposition excerpts from the deposition of Plaintiff Harold Harris

Exhibit “C” – Deposition excerpts from the deposition of Plaintiff, Robert Tipton, Jr., in his individual capacity;

Exhibit “D” – Plaintiff, Robert Tipton, Jr.’s Responses and Objections to Defendants’ First Set of Interrogatories;

Exhibit “E” – Excerpt from Delta Sigma Theta Constitution and Bylaws;

Exhibit “F” – Constitution of Delta Sigma Theta Sorority, Inc. (PLA00000102 – 103);

Exhibit “G” – Deposition excerpts from the deposition of Jackie Nickson, as the 30(b)(6) Representative of Delta Sigma Theta Sorority, Inc.;

Exhibit “H” – Deposition excerpts from the deposition of Robert Tipton, Jr., as the 30(b)(6) Representative of the MS NAACP Unit 5574

Exhibit “I” – Bylaws for the NAACP (PLA000001 – 93);

Exhibit “J” – Deposition excerpts from the deposition of Lee Caldwell;

Exhibit “K” – Deposition excerpts from the deposition of Chris Watson;

Exhibit “L” – March 21, 2022 Letter from C. Watson to V. Lynchard

Exhibit “M” – June 6, 2022 Board Meeting Minutes

Exhibit “N” – Deposition excerpts from the deposition of Jessie Medlin;

Exhibit “O” – Expert Report of William S. Cooper;

Exhibit “P” – Expert Rebuttal Report of William S. Cooper;

Exhibit “Q” – Expert Report of Jacob M. Grumbach;

Exhibit “R” – Expert Rebuttal Report of Jacob M. Grumbach;

Exhibit “S” – Expert Supplemental Report of Jacob M. Grumbach;

Exhibit “T” – Deposition excerpts from the deposition of Jacob M. Grumbach;

Exhibit “U” – Expert Report of Marvin King;

Exhibit “V” – Deposition excerpts from the deposition of Darryl Todd;

Exhibit “W” – Excerpts of Defendants’ Responses to Plaintiffs’ First Set of Interrogatories;

Exhibit “X” – Deposition excerpts from the deposition of Theresa G. Isom

For the reasons articulated in the contemporaneously filed supporting memorandum, Defendants request entry of judgment as a matter of law in their favor.

Dated: October 24, 2025.

Respectfully submitted,

PEHELPS DUNBAR LLP

BY: /s/ Nicholas F. Morisani

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CERTIFICATE OF SERVICE

I certify that on October 24, 2025, I electronically filed this motion with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record in this action.

/s/ Nicholas F. Morisani
Nicholas F. Morisani

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