

**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

**NON-BRIEF REPLY IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants DeSoto County, Mississippi, DeSoto County Board of Supervisors, and DeSoto County Election Commission (collectively "the County") submit this Non-Brief Reply in support of their [297] Motion for Summary Judgment. In addition to the contemporaneously filed supporting Reply memorandum, the County attaches the following exhibits:

Exhibit 1: Bentele, K. G., & O'Brien, E. E. 2013. *Jim Crow 2.0? Why States Consider and Adopt Restrictive Voter Access Policies*, Perspectives on Politics 11 (4);

Exhibit 2: Excerpts from Dr. Christopher Bonneau Deposition;

Exhibit 3: Excerpts from Theresa Isom Deposition;

Exhibit 4: Excerpts from Bacardi Harris Deposition;

Exhibit 5: Excerpts from Robert Tipton Jr. Deposition;

Exhibit 6: Excerpts from Darryl Todd Deposition;

Exhibit 7: Excerpts from Lovie West Deposition; and

Exhibit 8: Composite of Deposition Excerpts from Christopher Watson, Lee Caldwell, and Mark Gardner.

For the reasons set forth in the previously filed [298] Memorandum and contemporaneously filed supporting and Reply Memorandum, the County respectfully requests entry of summary judgment in its favor as to Plaintiffs' Section 2 claim.

Respectfully submitted,

PHELPS DUNBAR LLP

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CERTIFICATE OF SERVICE

I certify that on November 21, 2025, I electronically filed this document 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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