

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

AMBER SHERMAN, RACHAEL SPRIGGS,  
KERMIT MOORE, BLACK CLERGY  
COLLABORATIVE OF MEMPHIS, MEMPHIS  
A. PHILIP RANDOLPH INSTITUTE, THE  
EQUITY ALLIANCE,

*Plaintiffs,*

v.

TRE HARGETT, in his official capacity as  
Secretary of State of Tennessee, MARK GOINS,  
in his official capacity as Coordinator of Elections  
for Tennessee, STATE ELECTION  
COMMISSION, and DONNA BARRETT, JUDY  
BLACKBURN, JIMMY ELDRIDGE, MIKE  
MCDONALD, SECONDR A MEADOWS,  
VANECIA BELSER KIMBROW, and KENT  
YOUNCE, in their official capacities as members  
of the State Election Commission,

*Defendants.*

**THREE-JUDGE PANEL  
REQUESTED**

Civil Action No 26 Civ. 616

Judge Crenshaw

**RESPONSE TO MOTION FOR REASSIGNMENT**

Administrative Order No. 176 by its terms creates no presumption in favor of reassignment of a case merely because it is related, and under the circumstances, where the legal issues are completely distinct and there is a need for immediate temporary relief, the Court's retaining this case is in the interest of justice. *See* ECF No. 6. Plaintiffs adhered to the terms of Administrative Order No. 176 by properly marking this case as related to *Hale* matter, and then filed their motion to retain at the earliest possible moment to apprise the Court of their position in light of the fast-moving nature of this case.

Defendants' implication of any inappropriate action by "ACLU Counsel," Def.'s Opp. at 1-2, 8, ECF No. 18, is misleading and meritless.

Dated this 13th day of May, 2026.

Respectfully submitted,

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\*motion for admission *pro hac vice*  
forthcoming