

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MISSOURI STATE CONFERENCE OF )  
THE NATIONAL ASSOCIATION FOR )  
THE ADVANCEMENT OF COLORED )  
PEOPLE, et al., )

Plaintiffs, )

vs. )

Cause No. 4:14 CV 2077 RWS

FERGUSON-FLOISSANT SCHOOL )  
DISTRICT, et al., )

Defendants. )

**MOTION FOR SANCTIONS**

Defendant Ferguson-Florissant School District (“FFSD”), by and through counsel, moves the Court for sanctions to be imposed on Plaintiffs for witness tampering. Plaintiffs transmitted FFSD’s amended Fed. R. Civ. 26(a)(1) disclosures to the national NAACP office, which led to the witness being instructed not to testify.

WHEREFORE, FFSD prays this Court impose sanctions on Plaintiffs, including but not limited to, monetary penalties and attorney fees, as well as prohibiting Plaintiffs from litigating the motivations of FFSD’s former superintendent’s suspension and the supposed justifications for single-member district elections for school boards. FSD’s Memorandum in Support is attached hereto and incorporated herein. A copy of a Proposed Order has been filed with this Motion.

Respectfully submitted,

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s/ John A. Safarli

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is a person of such age and discretion as to be competent to serve papers. It is further certified that on September 4, 2015, the undersigned electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participant(s):

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Dated this 4th day of September, 2015.

s/ John A. Safarli  
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