

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION**

M. LA-TROY
ALEXANDRIA-WILLIAMS,

Petitioners,

v.

MARK GOINS, individual and official
capacity As Coordinator of Tennessee
Elections

MARY MANCINI, official capacity As
Chairwoman of the Tennessee
Democratic Party

LINDA PHILLIPS, SHELBY
COUNTY ELECTION
COMMISSIONER,
Steve Cohen,

Respon-

dents.

No. 2:22-cv-02134-MSN-cgc

RECEIVED

MAR 27 2023

Wendy R Oliver, Clerk
U.S. District Court
W.D. OF TN, Memphis

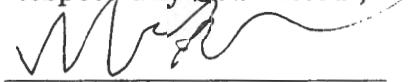
RESPONSE TO SHOW CAUSE REPORT AND RECOMMENDATION

Comes now the Plaintiff, pro se but prepared by counsel, and responds to the show cause report and recommendation for show cause for lack of completed summons in this case. Plaintiff's initial counsel in this matter, Paul Robinson, did not deliver on his promise to serve parties and due to the nature of the political power and influence in this case, Plaintiff has struggled to obtain counsel to move forward. Plaintiff has retained the services of attorney John M. Drake who is right now working to get admitted to the Western District of Tennessee, and has run into some roadblocks that will be discussed below but is confident can shortly be overcome. In support of this response, Plaintiff avers the following:

1. Plaintiff's former attorney Paul Robinson promised judge Norris in front of Plaintiff that he was going to serve the defendants and Plaintiff paid him to but he failed to do so. (Exhibit 1 : Affidavit of M. Latroy Alexandria-Williams)
2. Plaintiff had retained the assistance of attorney John Tennyson to handle this matter but, due to factors in another case that had nothing to do with Plaintiff, Mr. Tennyson was suspended and ultimately disbarred. (Exhibit 1)
3. Plaintiff looked to have attorney Julian Bolton handle the matter but his health declined to the point that he couldn't take the case. (Exhibit 1)
4. Attorney John Drake agreed to take the case but his license was under suspension until September 2022. (Exhibit 2: Affidavit John Drake)
5. As a condition of his reinstatement, Mr. Drake is required to work under the supervision of his mentor Chris Bellamy. (Exhibit 2)
6. Mr. Bellamy is able to sign off on Mr. Drake to be admitted to the Western District but he is requiring Mr. Drake to have his IOLTA account set up first. (Exhibit 2)
7. Mr. Drake has had difficulty with this because the banks have been confused over the fact that he lives in Alabama but his practice is in Tennessee. (Exhibit 2)
8. Mr. Drake has now set up the IOLTA and expects to have his application for admission to the Western District submitted within 24 hours.

WHEREFORE Plaintiff prays this Honorable Court not dismiss his case but allow it to go forward with new counsel.

Respectfully Submitted ,



M. LaTroy Williams
Prepared By Counsel
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Certificate Of Service

The undersigned hereby certifies that on March 27, 2023, the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users or, if they are not, by placing a true and correct copy in the United States mail, postage prepaid, to their address of record.



M. LaTroy Williams