

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

UNITED STATES OF AMERICA,)
by Nicholas deB. Katzenbach,)
Attorney General of the United States,)

Plaintiff)

v.)

Civil Number: 2:66-cv-00241-SHL

DYERSBURG BOARD OF EDUCATION;)
HUGH M. TODD, JR., Chairman, and)
WILLIAM MURRAY, GEORGE YARBRO,)
A.D. WALKER, JR., FRED CHILDRESS, and)
WILLIAM S. YATES, members of the)
Dyersburg Board of Education and)
W.C. WARREN, Superintendent of the)
Dyersburg City Schools,)

Defendants)

JOINT MOTION FOR DECLARATION OF UNITARY STATUS AND DISMISSAL

The Parties to this cause, Plaintiff United States of America and Defendant Dyersburg City Board of Education, by and through undersigned counsel, respectfully file this Joint Motion for Declaration of Unitary Status and Dismissal and hereby move the Court to order that the District has achieved full unitary status and to dismiss the above-captioned case. A Memorandum of Law in support of this Motion is filed today with the Court.

DATED: February 5, 2026

HARMEET K. DHILLON
Assistant Attorney General

JEFFREY MORRISON
Acting Chief, Educational Opportunities
Section

s/ Jordan K. Carpenter (email perm. 1-28-26)

PETER FEAMAN

FL Bar No. 260347

Senior Counsel

JORDAN K. CARPENTER

TN BPR # 035074

Counsel

Civil Rights Division

U.S. Department of Justice

950 Pennsylvania Ave. NW

Washington, DC 20530

Telephone: (202) 514-3847

Email: Jordan.Carpenter2@usdoj.gov

s/ D. Michael Dunavant (email perm. 1-28-26)

D. MICHAEL DUNAVANT

TN BPR # 017336

United States Attorney

SARAH PAZAR WILLIAMS

TN BPR # 031261

Assistant United States Attorney

Western District of Tennessee

167 N. Main Street, Suite 800

Memphis, TN 38103

Telephone: (901) 544-4321

Email: Michael.Dunavant@usdoj.gov

ATTORNEYS FOR PLAINTIFF

UNITED STATES OF AMERICA

Respectfully submitted,

s/ Debra D. Owen

DEBRA D. OWEN

TN BPR # 021626

JACKSON, SHIELDS, HOLT, OWEN & BRYANT

262 German Oak Drive

Memphis, TN 38018

Telephone: (901) 754-8001

Email: downen@jsyc.com

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of February, 2026, I filed the foregoing through the Court's ECF filing system such that a Notice of Electronic Filing will be transmitted to all counsel of record in the case.

s/ Debra D. Owen
DEBRA D. OWEN
Attorney for Defendant