

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

Just City, Inc., and class representatives
Deangelo Towns, and
Marshawn Barnes
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Floyd Bonner Jr.,
Shelby County Sheriff;

Lee Wilson,
**Presiding Shelby County General
Sessions Criminal Court Judge;** and

John Marshall, Robert Barber, Rhonda Harris,
Kevin Reed, Christopher Ingram, Shayla Purifoy,
Ross Sampson, Serena Gray, Terita Hewlett,
Mischelle Best, Kenya Smith, Zayid Saleem,
Kathy Kirk Johnson, Leslie Mazingo,
**Shelby County Judicial
Commissioners,**

in their official capacities,

Defendants.

Case No. 2:24-cv-2540-TLP-tmp

**PLAINTIFF'S MOTION FOR LEAVE TO FILE THE FIRST AMENDED
CLASS ACTION COMPLAINT**

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Plaintiff Just City, Inc. (“Plaintiff”) respectfully moves the Court for leave to file the attached First Amended Class Action Complaint (the “Amended Complaint”). The grounds for this motion are set forth in the Memorandum in Support of Plaintiff’s Motion for Leave to File the First Amended Class Action Complaint, filed herewith.

WHEREFORE, Plaintiff respectfully moves this Court to:

1. Enter an order granting Plaintiff leave to file the attached First Amended Class Action Complaint

Dated, March 5, 2025

Respectfully submitted,

/s/ Trisha Trigilio

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CERTIFICATE OF SERVICE

I, Trisha Trigilio, certify that on March 5, 2025, I caused a true and correct copy of the foregoing document to be filed electronically via the ECF system.

Respectfully submitted,

/s/ Trisha Trigilio

CERTIFICATE OF CONSULTATION WITH COUNSEL

I, Trisha Trigilio, certify that in an email exchange beginning Thursday, February 27, I consulted with counsel for Defendants, Julie Hale and Jasen Durrence, and counsel for the State, Brian Enright, Steven Griffin, and Jacob Durst, as to the relief requested by the Motion. The Defendants are unopposed to the relief sought by the Motion. The State declined to take a position on the Motion.

Respectfully submitted,

/s/ Trisha Trigilio