

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

ACLU OF TENNESSEE, Inc.)	
)	
Intervening Plaintiff,)	
v.)	No. 2:17-cv-02120-jpm-DKV
)	
THE CITY OF MEMPHIS,)	
)	
Defendant.)	

**DEFENDANT’S NOTICE OF DEPOSITION OF ACLU OF TENNESSEE, INC.
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

COMES NOW Defendant, The City of Memphis (“Defendant” or “City”), and files this Notice of Deposition of ACLU of Tennessee, Inc. (“ACLU-TN”), pursuant to Fed. R. Civ. P. 30(b)(6), on March 6, 2020, at 1:30 p.m. at the offices of Baker, Donelson, Bearman, Caldwell & Berkowitz, 211 Commerce St., #800, Nashville, Tennessee 37201. The deponent(s) will be questioned on the following subjects:

- (1) ACLU-TN’s position on whether any technology utilized by the Memphis Police Department violates the *Kendrick* Consent Decree;
- (2) Non-privileged communications with anyone regarding ACLU’s position on whether any technology utilized by the Memphis Police Department violates the *Kendrick* Consent Decree;
- (3) ACLU-TN’s knowledge or awareness of any asserted violations of the *Kendrick* Consent Decree since the date of the trial of this matter in August of 2018;
- (4) Non-privileged communications with anyone regarding any asserted violations of the *Kendrick* Consent Decree since the date of the trial of this matter in August of 2018.

The deposition will be taken before an officer authorized to administer the oath, shall be recorded by audiovisual and by stenographic means, may be used for all purposes authorized by law, and shall continue from day to day until complete.

Respectfully Submitted,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.

/s Bruce A. McMullen

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*Attorneys for Defendant, The City of
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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2020, the foregoing was filed and will be served by the Court's electronic filing system to:

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/s Bruce A. McMullen