

**U.S. District Court
Alabama Middle District (Montgomery)
CIVIL DOCKET FOR CASE #: 2:18-cv-00977-WKW-SRW**

Cook et al v. Taylor
Assigned to: Honorable Judge William Keith Watkins
Referred to: Honorable Judge Susan Russ Walker
Cause: 42:1983 Civil Rights Act

Date Filed: 11/19/2018
Date Terminated: 05/01/2019
Jury Demand: None
Nature of Suit: 950 Constitutional – State Statute
Jurisdiction: Federal Question

Plaintiff

Lakendra Cook

on behalf of herself and those similarly situated

represented by **Danielle Davis**
201 St Charles Ave – Ste 2000
New Orleans, LA 70170
504-526-1531
Email: danielle.davis@splcenter.org
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Micah West

Southern Poverty Law Center
400 Washington Ave
Montgomery, AL 36104
334-956-8200
Fax: 334-956-8481
Email: micah.west@splcenter.org
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Sara Michelle Zampierin

Southern Poverty Law Center
400 Washington Avenue
Montgomery, AL 36104
334-956-8326
Fax: 334-956-8481
Email: sara.zampierin@splcenter.org
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Christopher Gray

on behalf of himself and those similarly situated
TERMINATED: 01/22/2019

represented by **Danielle Davis**
(See above for address)
TERMINATED: 01/22/2019
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Micah West

(See above for address)
TERMINATED: 01/22/2019
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Sara Michelle Zampierin

(See above for address)
TERMINATED: 01/22/2019
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

Sharon Motley
*on behalf of herself and those similarly
situated*

represented by **Danielle Davis**
(See above for address)
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

Micah West
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Sara Michelle Zampierin
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

Hal Taylor
*in his official capacity as Secretary of the
Alabama Law Enforcement Agency*

represented by **Brad A. Chynoweth**
State of Alabama
Office of the Attorney General
501 Washington Avenue
Post Office Box 300152
Montgomery, AL 36130
334.242.7997
Fax: 334.353.8440
Email: Brad.Chynoweth@AlabamaAG.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Laura Elizabeth Howell
Office of the Alabama Attorney General
P O Box 300152
Montgomery, AL 36130
334-353-1018
Fax: 334-353-8440
Email: laura.howell@alabamaag.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Meridith Hamilton Barnes
Alabama Bureau of Parsons & Paroles
100 Capitol Commerce Blvd; Suite 310
Montgomery, AL 36117
334-242-8702
Fax: 334-315-4793
Email: Meridith.Barnes@paroles.alabama.gov
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
11/19/2018	<u>1</u>	COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF against Hal Taylor (Filing fee \$ 400.00 receipt number 4602051480.), filed by Christopher Gray, Lakendra Cook, Sharon Motley. (Attachments: # <u>1</u> Declaration of Lakendra Cook, # <u>2</u> Declaration of Christopher Gray, # <u>3</u> Declaration of Sharon Motley, # <u>4</u> Civil Cover Sheet, # <u>5</u> Receipt)(wcl,) (Entered: 11/20/2018)
11/19/2018	<u>2</u>	MOTION for Preliminary Injunction by Lakendra Cook, Christopher Gray, Sharon Motley. (Attachments: # <u>1</u> Text of Proposed Order)(wcl,) (Entered: 11/20/2018)
11/19/2018	<u>3</u>	BRIEF/MEMORANDUM in Support re <u>2</u> MOTION for Preliminary Injunction filed by Lakendra Cook, Christopher Gray, Sharon Motley. (wcl,) (Entered: 11/20/2018)

11/19/2018	<u>4</u>	MOTION for Class Certification by Lakendra Cook, Christopher Gray, Sharon Motley. (wcl,) (Entered: 11/20/2018)
11/19/2018	<u>5</u>	MEMORANDUM of Law in Support re <u>4</u> MOTION for Class Certification filed by Lakendra Cook, Christopher Gray, Sharon Motley. (wcl,) (Entered: 11/20/2018)
11/19/2018	<u>6</u>	DECLARATION OF MICAH WEST in Support re <u>2</u> MOTION for Preliminary Injunction, <u>4</u> MOTION for Class Certification, filed by Lakendra Cook, Christopher Gray, Sharon Motley. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Exhibit H, # <u>9</u> Exhibit I, # <u>10</u> Exhibit J, # <u>11</u> Exhibit K, # <u>12</u> Exhibit L, # <u>13</u> Exhibit M, # <u>14</u> Exhibit N, # <u>15</u> Exhibit O, # <u>16</u> Exhibit P, # <u>17</u> Exhibit R, # <u>18</u> Exhibit S, # <u>19</u> Exhibit T, # <u>20</u> Exhibit U, # <u>21</u> Exhibit V, # <u>22</u> Exhibit W)(wcl,) (Entered: 11/20/2018)
11/19/2018	<u>7</u>	Summons Issued as to Hal Taylor and returned to counsel for personal service by process server. (wcl,) (Entered: 11/20/2018)
11/21/2018	<u>8</u>	Notice of Deficiency requiring filing of Corporate Disclosure/Conflict Statement sent to Lakendra Cook, Christopher Gray, Sharon Motley; Corporate Disclosures due by 12/3/2018. (Attachments: # <u>1</u> Corporate/Conflict Disclosure Attachment) (wcl,) (Entered: 11/21/2018)
11/21/2018	<u>9</u>	Corporate/Conflict Disclosure Statement by Lakendra Cook, Christopher Gray, Sharon Motley re <u>8</u> Notice of Deficiency requiring filing of Corporate Disclosure/Conflict Statement. (West, Micah) (Main Document 9 replaced on 11/21/2018) (wcl,). Modified on 11/21/2018 to attach a corrected PDF document to reflect as filed on behalf of all plaintiffs (wcl,). (Entered: 11/21/2018)
11/21/2018	<u>10</u>	SUMMONS Returned Executed by Christopher Gray, Lakendra Cook, Sharon Motley. Hal Taylor served on 11/20/2018, answer due 12/11/2018. (West, Micah) (Entered: 11/21/2018)
11/21/2018	<u>11</u>	NOTICE of Correction re <u>9</u> Corporate/Conflict Disclosure Statement, to attach a corrected PDF document to reflect as filed on behalf of all plaintiffs. (Attachments: # <u>1</u> Corrected Main PDF Document to Docket Entry <u>9</u>)(wcl,) (Entered: 11/21/2018)
11/29/2018	<u>12</u>	MOTION for Extension of Time to File Answer re <u>2</u> MOTION for Preliminary Injunction, <u>1</u> Complaint, <u>4</u> MOTION for Class Certification by Hal Taylor. (Chynoweth, Brad) (Entered: 11/29/2018)
11/29/2018		***PURSUANT TO THE <u>12</u> MOTION – Attorney Laura Elizabeth Howell for Hal Taylor added. (No pdf attached to this entry) (wcl,) (Entered: 11/29/2018)
11/29/2018	<u>13</u>	Notice of Deficiency requiring filing of Corporate Disclosure/Conflict Statement sent to Hal Taylor; Corporate Disclosures due by 12/10/2018. (Attachments: # <u>1</u> Corporate/Conflict Disclosure Attachment) (wcl,) (Entered: 11/29/2018)
11/29/2018	<u>14</u>	Corporate/Conflict Disclosure Statement by Hal Taylor re <u>13</u> Notice of Deficiency requiring filing of Corporate Disclosure/Conflict Statement. (Chynoweth, Brad) (Entered: 11/29/2018)
11/29/2018	<u>15</u>	Motion for Admission Pro Hac Vice for Danielle Davis (Filing fee \$ 50.00 receipt number 4602051548.) by Lakendra Cook, Christopher Gray, Sharon Motley. (Attachments: # <u>1</u> Exhibit A – Certificates of Good Standing, # <u>2</u> Text of Proposed Order, # <u>3</u> Receipt) (wcl,) (Entered: 11/29/2018)
11/30/2018	<u>16</u>	TEXT ORDER granting <u>15</u> Motion for Admission Pro Hac Vice for Danielle Davis. Signed by Chief Judge William Keith Watkins on 11/30/2018. (No pdf attached to this entry) (wcl,) (Entered: 11/30/2018)
12/03/2018	<u>17</u>	ORDER granting <u>12</u> Unopposed Motion for Extension of Time as follows: (1) Dft shall file an answer or otherwise respond to the complaint on or before 12/21/2018; (2) Dft shall file a response to the <u>2</u> Motion for Preliminary Injunction on or before 12/21/2018; and (3) Plfs are permitted until 1/14/2019, to file a reply to the Motion for Preliminary Injunction; Plfs have also filed a <u>4</u> motion for class certification; A briefing order on that motion will be entered separately at a later date. Signed by Chief Judge William Keith Watkins on 12/3/2018. (wcl,) (Entered: 12/03/2018)

12/18/2018	<u>18</u>	NOTICE of Appearance by Meridith Hamilton Barnes on behalf of Hal Taylor (Barnes, Meridith) (Main Document 18 replaced on 12/18/2018) (wcl,). Modified on 12/18/2018 to attach the corrected PDF document to include the correct signature and service dates (wcl,). (Entered: 12/18/2018)
12/18/2018	<u>19</u>	NOTICE of Correction re <u>18</u> Notice of Appearance, to attach the corrected PDF document to include the correct signature and service dates. (Attachments: # <u>1</u> Corrected Main PDF Document to Docket Entry <u>18</u>)(wcl,) (Entered: 12/18/2018)
12/21/2018	<u>20</u>	MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM by Hal Taylor. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Exhibit 3, # <u>4</u> Exhibit 4)(Chynoweth, Brad) (Entered: 12/21/2018)
12/21/2018	<u>21</u>	BRIEF/MEMORANDUM in Support re <u>20</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM <i>and in Opposition re 2 Motion for Preliminary Injunction</i> filed by Hal Taylor. (Chynoweth, Brad) (Entered: 12/21/2018)
12/21/2018		BRIEF/MEMORANDUM in Opposition re <u>2</u> MOTION for Preliminary Injunction filed by Hal Taylor. (No pdf attached to this entry – See doc <u>21</u> for pdf) (wcl,) (Entered: 12/26/2018)
01/14/2019	<u>22</u>	(RESPONSE to Motion) Consolidated Reply in Support re <u>2</u> MOTION for Preliminary Injunction, and Response in Opposition re <u>20</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM filed by Lakendra Cook, Christopher Gray, Sharon Motley. (Attachments: # <u>1</u> Affidavit of Micah West, # <u>2</u> Exhibit X, # <u>3</u> Exhibit Y, # <u>4</u> Exhibit Z)(West, Micah) Modified on 1/15/2019 to clarify the docket text (wcl,). (Entered: 01/14/2019)
01/18/2019	<u>23</u>	NOTICE of Voluntary Dismissal as to Christopher Gray by All Plaintiffs (West, Micah) Modified on 1/22/2019 to clarify the docket text (kr,). (Entered: 01/18/2019)
01/22/2019	<u>24</u>	CLERK'S NOTICE of Voluntary Dismissal of Christopher Gray.(kr,) (Entered: 01/22/2019)
01/22/2019	<u>25</u>	Unopposed MOTION for Leave to File <i>Reply Brief in Support of Motion to Dismiss</i> by Hal Taylor. (Attachments: # <u>1</u> Exhibit Reply in Support of Motion to Dismiss)(Chynoweth, Brad) (Entered: 01/22/2019)
01/23/2019	26	TEXT ORDER granting <u>25</u> Unopposed Motion for Leave to File <i>Reply Brief in Support of Motion to Dismiss</i>. Signed by Chief Judge William Keith Watkins on 1/23/2019. (No pdf attached to this entry) (wcl,) (Entered: 01/23/2019)
01/23/2019	<u>27</u>	REPLY to Response to Motion re <u>20</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM filed by Hal Taylor. (Chynoweth, Brad) (Entered: 01/23/2019)
01/24/2019	<u>28</u>	MOTION to Stay <i>Discovery and All Rule 26 Obligations Pending a Ruling on Motion to Dismiss</i> by Hal Taylor. (Chynoweth, Brad) (Entered: 01/24/2019)
01/24/2019	29	TEXT ORDER: Upon consideration of Dft's <u>28</u> motion to stay discovery and all Rule 26 obligations pending a ruling on the motion to dismiss, it is ORDERED that Plfs respond to the motion on or before 2/1/2019. Signed by Chief Judge William Keith Watkins on 1/24/2019. (No pdf attached to this entry)(wcl,) (Entered: 01/24/2019)
01/29/2019	<u>30</u>	Unopposed MOTION for Leave to File <i>Sur–Reply in Opposition to Defendant's Motion to Dismiss</i> by Lakendra Cook, Sharon Motley. (Attachments: # <u>1</u> Exhibit Proposed Sur–Reply in Opposition to Defendant's Motion to Dismiss)(West, Micah) (Entered: 01/29/2019)
01/30/2019	31	TEXT ORDER granting <u>30</u> Unopposed Motion for Leave to File <i>Sur–Reply in Opposition to Dft's Motion to Dismiss</i>. Signed by Chief Judge William Keith Watkins on 1/30/2019. (No pdf attached to this entry) (wcl,) (Entered: 01/30/2019)
01/30/2019	<u>32</u>	SUR–REPLY BRIEF re <u>20</u> MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM , <u>22</u> Response to Motion, <u>27</u> REPLY to Response to Motion, filed by Lakendra Cook, Sharon Motley. (West, Micah) Modified on 1/30/2019 to clarify the docket text and to add the link to the <u>27</u> Reply (wcl,). (Entered: 01/30/2019)

02/01/2019	<u>33</u>	RESPONSE to Motion re <u>28</u> MOTION to Stay <i>Discovery and All Rule 26 Obligations Pending a Ruling on Motion to Dismiss</i> filed by Lakendra Cook, Sharon Motley. (West, Micah) (Entered: 02/01/2019)
03/15/2019	<u>34</u>	ORDER: It is ORDERED: (1) Defendant's <u>28</u> motion to stay discovery and Rule 26 obligations pending a ruling on its motion to dismiss is GRANTED. (2) The parties' discovery and Rule 26 obligations are STAYED pending the court's ruling on Defendant's <u>20</u> motion to dismiss. Signed by Honorable Judge William Keith Watkins on 3/15/2019. (kr,) (Entered: 03/15/2019)
05/01/2019	<u>35</u>	MEMORANDUM OPINION AND ORDER: It is ORDERED: (1) Plaintiffs' <u>2</u> motion for a preliminary injunction is DENIED; (2) Plaintiffs' <u>4</u> motion for class certification is DENIED; (3) The State's <u>20</u> motion to dismiss is GRANTED; (4) This case is DISMISSED without prejudice. Signed by Honorable Judge William Keith Watkins on 5/1/2019. (kr,) (Entered: 05/01/2019)
05/01/2019	<u>36</u>	FINAL JUDGMENT: it is the ORDER, JUDGMENT, and DECREE of the court that this action is DISMISSED without prejudice; DIRECTING the Clerk of the Court to enter this document on the civil docket as a final judgment pursuant to Rule 58 of the FRCP. Signed by Honorable Judge William Keith Watkins on 5/1/2019. (Attachments: # <u>1</u> Civil Appeals Checklist)(kr,) (Entered: 05/01/2019)