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July 2, 2015

**By ECF and Electronic Mail**

The Honorable Carlton W. Reeves  
United States District Court  
Southern District of Mississippi  
501 E. Court St., Suite 5.500  
Jackson, MS 39201

*Campaign for Southern Equality et al. v. Bryant et al.,*  
No. 3:14-cv-00818-CWR-LRA

Dear Judge Reeves:

As you know, we represent plaintiffs in the above-captioned matter.

It has come to our attention that as of today, clerks in at least four Mississippi counties are still not issuing marriage licenses to same-sex couples.

Given the upcoming long holiday weekend, we submit this letter at this time to respectfully request that the Court clarify that the permanent injunction it issued yesterday (Dkt. No. 34) applies to each and every one of Mississippi's 82 circuit clerks and their deputies, including but not limited to the clerks of Holmes, Issaquena, Simpson, and Smith Counties. Circuit clerks in every county of Mississippi are clearly included among the "agents, officers, employees, and subsidiaries" of Mississippi covered by this Court's injunction. *See, e.g., U.S. v. Harris*, 2007 WL 2028948, at \*3 n.2 (S.D. Miss.

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The Honorable Carlton W. Reeves

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2007) (“Mississippi law considers circuit and chancery clerks to be officers of the county in which they are elected.”) A proposed order to this effect is attached.

To be clear, Plaintiffs do not seek an order of contempt against any individual or entity at this time. Instead, we seek only to ensure that there is no doubt as to the scope of this Court’s permanent injunction so that compliance can proceed without delay.

Respectfully submitted,

  
Roberta A. Kaplan

Enclosures

cc: All Counsel of Record (by ECF)  
cc: Earline Wright-Hart, Circuit Clerk, Holmes County  
Earline Fortner, Circuit Clerk, Issaquena County  
Steve Womack, Circuit Clerk, Simpson County  
Anthony Grayson, Circuit Clerk, Smith County (by electronic mail)



For the avoidance of doubt, the Permanent Injunction applies with equal force and effect to all agents, officers, employees, and subsidiaries of the state of Mississippi, as well as anyone in active concert or participation with them, including but not limited to the following circuit clerks and their deputies:

1. Earline Wright-Hart, Circuit Clerk, Holmes County
2. Earline Fortner, Circuit Clerk, Issaquena County
3. Steve Womack, Circuit Clerk, Simpson County
4. Anthony Grayson, Circuit Clerk, Smith County

The Attorney General is directed to distribute this order promptly to all circuit clerks and any other official in Mississippi charged with the duty of issuing marriage licenses.

**SO ORDERED**, this \_\_\_ day of July, 2015

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United States District Judge