

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.
	:	5:20-cv-00453-MTT
	:	
TIMOTHY WARD, <i>et al.</i> ,	:	
	:	
Defendants.	:	

MOTION FOR LEAVE TO FILE SURREPLY

Defendants Timothy Ward, Sharon Lewis, Javel Jackson, Ahmed Holt, Robert Toole, Benjamin Ford, Jack Sauls, Brooks Benton, and Grace Atchison, through counsel, and pursuant to Local Rule 7.3.1C., respectfully request leave to file a surreply in opposition to Plaintiff’s Motion for Limited Expedited Discovery and to Compel Production of Documents (Doc. 87).

Defendants seek to address the following in the surreply: (1) Plaintiff’s reply represents that Defendants either did not assert or have waived objections to Plaintiff’s expedited document requests based on relevance, overbreadth, and proportionality. Doc. 94 at 1. This representation is inaccurate; Defendants have asserted and have not waived the referenced objections and would like to address those objections; (2) Plaintiff’s reply does not reference pertinent email communications between counsel which were exchanged after the recent motions hearing; and (3) Plaintiff’s reply seeks relief that is different from (and greater than) the relief that was sought in the initial motion.

Defendants have prepared a surreply on these points which is four pages in length. Defendants would attach to the surreply the referenced email communications, and also

pages from the Tia Fletcher and Tamara Cantera depositions which pertain to the relevance, overbreadth, and proportionality objections.

Wherefore, Defendants ask that the Court grant leave to file the surreply.

Respectfully submitted,

Christopher M. Carr 112505
Attorney General

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Deputy Attorney General

s/ Roger A. Chalmers
Roger A. Chalmers 118720
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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Tyler Rose Clemons
Andrea Chinyere Ezie
Elizabeth Littrell
Annarita L. McGovern
Terry Lynn Long
Maya Gyan Rajaratnam

This 27th day of May, 2021.

s/ Roger A. Chalmers

Roger A. Chalmers