

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION**

<p>CHELSEY NELSON PHOTOGRAPHY LLC and CHELSEY NELSON,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT, et al.,</p> <p style="text-align: center;">Defendants.</p>	<p style="text-align: center;">Case No. 3:19-cv-851-BJB-CHL</p>
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DEFENDANTS’ CROSS-MOTION FOR SUMMARY JUDGMENT

Defendants Louisville/Jefferson County Metro Government, Louisville Metro Human Relations Commission – Enforcement, Louisville Metro Human Relations Commission – Advocacy, Verná Goatley, in her official capacity as Executive Director of the HRC, Marie Dever, Kevin Delahanty, Charles Lanier, Sr., Leslie Faust, William Sutter, Ibrahim Syed, and Leonard Thomas, in their official capacities as members of HRC-Enforcement (collectively, “Defendants”), by counsel, pursuant to Fed. R. Civ. P. 56, hereby move for summary judgment dismissal of all claims asserted by Plaintiffs Chelsey Nelson Photography and Chelsey Nelson (collectively, “Plaintiffs”). The grounds for this motion are fully set forth in the accompanying memorandum of law and attached exhibits, which also constitute Defendants’ response to the motion for summary judgment filed by Plaintiffs [Doc. 92]. A proposed judgment has been tendered with this motion.

Respectfully submitted,

/s/ Casey L. Hinkle

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2021, the foregoing was filed via the Court's electronic filing system, which will automatically send notice of such filing to all counsel of record.

/s/ Casey L. Hinkle

Counsel for Defendants

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**[PROPOSED] ORDER GRANTING
DEFENDANTS’ CROSS-MOTION FOR SUMMARY JUDGMENT**

Plaintiffs Chelsey Nelson Photography and Chelsey Nelson (collectively, “Plaintiffs”) have filed a motion for summary judgment, seeking the issuance of a permanent injunction and declaratory judgment. Defendants Louisville/Jefferson County Metro Government, Louisville Metro Human Relations Commission – Enforcement, Louisville Metro Human Relations Commission – Advocacy, Verná Goatley, in her official capacity as Executive Director of the HRC, Marie Dever, Kevin Delahanty, Charles Lanier, Sr., Leslie Faust, William Sutter, Ibrahim Syed, and Leonard Thomas, in their official capacities as members of HRC-Enforcement (collectively, “Defendants”) have filed a combined response to Plaintiffs’ motion and cross-motion for summary judgment, seeking dismissal of Plaintiffs’ claims. Having considered the arguments of the parties on Plaintiffs’ motion and Defendants’ motion and being otherwise duly advised, the Court hereby DENIES Plaintiffs’ motion for summary judgment, GRANTS Defendants’ cross-motion for summary judgment, and dismisses Plaintiffs’ claims with prejudice. This is a final and appealable order.

Tendered by:

/s/ Casey L. Hinkle

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