

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>GERALD LYNN BOSTOCK,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>CIVIL ACTION</b>
	)	<b>NO: 1:16-cv-01460-ELR-WEJ</b>
<b>CLAYTON COUNTY,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

COMES NOW Clayton County (the “County”), the Defendant in the above-referenced case, and, pursuant to Rules 7 and 56 of the Federal Rules of Civil Procedure and Local Rule 56.1 of the United States District Court for the Northern District of Georgia, hereby respectfully moves this Court for Summary Judgment in favor of the County on all issues, there being no genuine issue as to the material facts.

In support of this Motion for Summary Judgment, the County hereto attaches and incorporates by specific reference its Statement Of Material Facts As To Which There Exists No Genuine Issue To Be Tried and Exhibits 1-6 annexed thereto, Memorandum Of Law In Support Of Defendant’s Motion For Summary Judgment, including the facts submitted in the pleadings and discovery, and all pleadings and discovery of record at the time of the Court’s consideration of this Motion.

**WHEREFORE**, the County herein prays that its Motion for Summary Judgment be inquired into and sustained and that Plaintiff's Third Amended Complaint and this action as a whole be dismissed with prejudice.

Respectfully submitted,

**FREEMAN MATHIS & GARY, LLP**

*/s/ Jack R. Hancock* \_\_\_\_\_

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the within and foregoing **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

This 21st day of March, 2022.

*/s/ Jack R. Hancock* \_\_\_\_\_

Jack R. Hancock

Georgia Bar No. 322450

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the within and foregoing **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following counsel of record:

Thomas J. Mew, IV  
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This 21st day of March, 2022.

*/s/ Jack R. Hancock* \_\_\_\_\_

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