

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

EDWARD BRAGGS, et al.)	
)	
Plaintiffs,)	
)	
)	
v.)	
)	
)	
JEFFERSON DUNN, in his official)	
capacity as Commissioner of the)	
Alabama Department of)	
Corrections, et al.)	
)	
Defendants.)	

CIVIL ACTION NO.
2:14-cv-00601-MHT-WC
Judge Myron H. Thompson

**JOINT MOTION TO CONTINUE EVIDENTIARY HEARING ON
SUPPLEMENTAL LIABILITY OPINION REMEDY**

The Court has scheduled an evidentiary hearing “on [the] remedy for violations found in [the] supplemental liability opinion” to begin on November 12, 2019. Doc. 2612. Among the additional remedies Plaintiffs seek is the expansion of protective housing within ADOC. Doc. 2398 at 14-16.

The Parties have agreed to mediate the issue of protective housing in coordination with ongoing United States Department of Justice negotiations so as to avoid potential conflict between any relief granted by the Court in this case and any relief obtained by the Department of Justice. The Parties have agreed to mediate the issue in-person starting on October 23, 2019.

To allow the Parties to focus their efforts on mediation without having to simultaneously engage in discovery and hearing preparation, the Parties jointly move to continue the November 12, 2019 evidentiary hearing related to the supplemental liability opinion until January 24, 2020.

Dated: October 3, 2019

Respectfully Submitted,

/s/ Caitlin J. Sandley

Caitlin J. Sandley

One of the Attorneys for Plaintiffs

Southern Poverty Law Center

400 Washington Avenue

Montgomery, AL 36104

Caitlin J. Sandley (ASB-5317-S48R)
Jonathan Blocker (ASB-6818-G19I)
SOUTHERN POVERTY LAW CENTER
400 Washington Avenue
Montgomery, AL 36104
Telephone: (334) 956-8200
Facsimile: (334) 956-8481
cj.sandley@splcenter.org
jonathan.blocker@splcenter.org

Lisa W. Borden (ASB-5673-D57L)
William G. Somerville, III (ASB-6185-E63W)
Andrew P. Walsh (ASB-3755-W77W)
Dennis Nabors
Patricia Clotfelter (ASB-0841-F43P)
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ PC
420 20th Street North, Suite 1400
Birmingham, AL 35203
lborden@bakerdonelson.com
wsomerville@bakerdonelson.com
awalsh@bakerdonelson.com

dnabors@bakerdonelson.com
pclotfelter@bakerdonelson.com

/s/ Anil A. Mujumdar

Anil A. Mujumdar (ASB-2004-L65M)
One of the Attorneys for Plaintiffs
Alabama Disabilities Advocacy Program
2332 2nd Avenue North
Birmingham, AL 35203

Gregory M. Zarzaur, Esq. (ASB-0759-E45Z)
Anil A. Mujumdar, Esq. (ASB-2004-L65M)
Denise Wiginton, Esq. (ASB-5905-D27W)
ZARZAUR
2332 2nd Avenue North
Birmingham, AL 35203
Telephone: (205) 983-7985
Facsimile: (888) 505-0523
gregory@zarzaur.com
anil@zarzaur.com
denise@zarzaur.com

William Van Der Pol, Jr., Esq. (ASB-2112-114F)
Glenn N. Baxter, Esq. (ASB-3825-A41G)
Lonnie Williams, Esq.
Barbara A. Lawrence, Esq.
Andrea J. Mixson, Esq.
Ashley N. Austin, Esq. (ASB-1059-F69L)
ALABAMA DISABILITIES
ADVOCACY PROGRAM
Box 870395
Tuscaloosa, AL 35487
Telephone: (205) 348-4928
Facsimile: (205) 348-3909
wvanderpoljur@adap.ua.edu
gnbaxter@adap.ua.edu
lwilliams@aadap.ua.edu
blawrence@adap.ua.edu

amixson@adap.ua.edu
aaustin@adap.ua.edu

/s/ William R. Lunsford

William R. Lunsford

*One of the Attorneys for the Commissioner
and Associate Commissioner*

William R. Lunsford
Matthew B. Reeves
Melissa K. Marler
Stephen C. Rogers
Alyson L. Smith
Melissa C. Neri
MAYNARD, COOPER & GALE, PC
655 Gallatin Street
Huntsville, AL 35801
Telephone: (256) 512-5710
Facsimile: (256) 512-0119
blunsford@maynardcooper.com
mreeves@maynardcooper.com
mmarler@maynardcooper.com
srogers@maynardcooper.com
asmith@maynardcooper.com
mneri@maynardcooper.com

Luther M. Dorr, Jr.
MAYNARD, COOPER & GALE, PC
1901 Sixth Avenue North
2400 Regions Harbert Plaza
Birmingham, AL 35203
Telephone: (205) 254-1178
Facsimile: (205) 714-6438
rdorr@maynardcooper.com

John G. Smith
David R. Boyd
BALCH & BINGHAM LLP
Post Office Box 78
Montgomery, AL 36101-0078
Telephone: (334) 834-6500

Facsimile: (866) 316-9461
jgsmith@balch.com
dboyd@balch.com

Steven C. Corhern
BALCH & BINGHAM LLP
Post Office Box 306
Birmingham, AL 35201-0306
Telephone: (205) 251-8100
Facsimile: (205) 488-5708
scorhern@balch.com

Gary L. Willford, Jr.
Joseph G. Stewart
Stephanie L. Smithee
ALABAMA DEPARTMENT OF CORRECTIONS
Legal Division
301 South Ripley Street
Montgomery, Alabama 36130
Telephone (334) 353-3884
Facsimile (334) 353-3891
gary.willford@doc.alabama.gov
joseph.stewart@doc.alabama.gov
stephanie.smithee@doc.alabama.gov