

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KELLIE PEARSON, ROGER BURRELL,)
BRIAN GIVENS, and THE LAW)
OFFICES OF MARK BOOKER, on)
behalf of themselves and those)
similarly situated,)

Plaintiffs,)

v.)

Case No. 18-cv-11130

THOMAS M. HODGSON,)
In His Official Capacity as Sheriff)
Of Bristol County)

and)

SECURUS TECHNOLOGIES, INC.,)

Defendants.)

PLAINTIFFS' MOTION
FOR PARTIAL SUMMARY JUDGMENT ON COUNT 1
OF THEIR COMPLAINT AGAINST DEFENDANT THOMAS M. HODGSON
IN HIS OFFICIAL CAPACITY AS SHERIFF OF BRISTOL COUNTY

Plaintiffs, Kellie Pearson, and the Law Offices of Mark Booker, on behalf of themselves and those similarly situated (“Plaintiffs”) respectfully move this Court, pursuant to the provisions of Fed. R. Civ. P. 56(c), for entry of partial summary judgment on Count 1 of their Complaint against Thomas M. Hodgson (“Hodgson”) in his official capacity as Sheriff of Bristol County. In support of their motion, Plaintiffs have filed herewith a Memorandum in Support of Partial Summary Judgment and a separate Statement of Undisputed Material Facts.

REQUEST FOR ORAL ARGUMENT

Plaintiffs respectfully request a hearing to present their arguments in support of this Motion pursuant to Local Rule 7.1(d).

Dated: July 26, 2019

Respectfully submitted,

By: /s/Stuart T. Rossman

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LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Stuart T. Rossman, counsel for Plaintiffs, hereby certify that I conferred with counsel for Defendants with regards to this Motion for Partial Summary Judgment on or before July 26, 2019.

/s/Stuart T. Rossman
Stuart T. Rossman, BBO #430640

CERTIFICATE OF SERVICE

I, Stuart T. Rossman, hereby certify that the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 26, 2019.

/s/Stuart T. Rossman
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