

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

LESSIE BENNINGFIELD RANDLE; VIOLA)
FLETCHER; HUGHES VAN ELLISS, SR.; HISTORIC)
VERNON A.M.E. CHURCH, INC.; LAUREL)
STRADFORD; ELLOISE COCHRANE-PRICE;)
TEDRA WILLIAMS; DON M. ADAMS; DON W.)
ADAMS; STEPHEN WILLIAMS; AND THE)
TULSA AFRICAN ANCESTRAL SOCIETY,)

Plaintiffs,)

vs.)

CITY OF TULSA; TULSA REGIONAL CHAMBER;)
TULSA DEVELOPMENT AUTHORITY; TULSA)
METROPOLITAN AREA PLANNING COMMIS-)
SION; BOARD OF COUNTY COMMISSIONERS)
FOR TULSA COUNTY, OKLAHOMA; VIC)
REGALADO, IN HIS OFFICIAL CAPACITY AS)
SHERIFF OF TULSA COUNTY; and OKLAHOMA)
MILITARY DEPARTMENT,)

Defendants.)

DISTRICT COURT
FILED

JUL 19 2021

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

Case No.: CV-2020-01179

Judge Caroline Wall

**CORRECTION TO DEFENDANTS' JOINT MOTION FOR LEAVE TO FILE
REPLIES IN SUPPORT OF THEIR MOTIONS TO DISMISS TO NOTE OBJECTION**

Defendants, City of Tulsa, Tulsa Metropolitan Area Planning Commission, Tulsa Regional Chamber, Tulsa Development Authority, Board of County Commissioners for Tulsa County, Oklahoma, Vic Regalado in his official capacity as Sheriff of Tulsa County, and Oklahoma Military Department (collectively "Defendants"), filed their joint motion in the belief Plaintiffs' counsel had consented to the filing. Plaintiffs' counsel now advises that he does object to the Defendants' request. Defendants accordingly advise the Court that Plaintiffs' counsel does object, and file this correction to their joint motion.

Defendants jointly request leave of Court to file replies in support of their respective Motions to Dismiss. Defendants state the following in support.

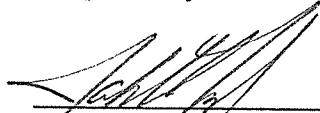
1. Reply briefs are necessary to address the multitude of new and complex issues and arguments raised by Plaintiffs in their Responses to Defendants' Motions to Dismiss.

2. Due to the amount of information pled in Plaintiffs' Amended Petition, the breadth of law implicated in this action, and the arguments and counter-arguments made by the parties, Defendants respectfully request a twenty (20) page limit for their individual and respective replies.

3. Under these same considerations, Defendants further request that they be given thirty (30) days from the filing of an Order of this Court granting the requested leave to file their replies.

Respectfully submitted,

By



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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of July, 2021, a true and correct copy of the above and foregoing was sent to the following via U.S. Mail, with correct postage fully prepaid thereon:

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