



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

DISTRICT COURT
FILED

MAR 18 2022

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

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.)

Case No.: CV-2020-01179
Judge Caroline Wall

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.)

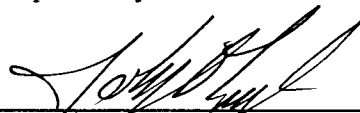
**DEFENDANTS' JOINT OPPOSITION TO
PLAINTIFFS' MOTION FOR LEAVE TO FILE 13-PAGE REPLY BRIEF**

The *J & J* opinion is 28 pages. The parties' supplemental briefing to explain *J & J* in the context of this case already is 33 pages. Yet another 13 pages of re-explaining won't help anything. At some point, the Supreme Court's written opinion in *J & J* must speak for itself.

Defendants respectfully request that the Court decline further briefing on the pending motions to dismiss.

Respectfully submitted,

By:



JOHN H. TUCKER, OBA 9110
jtucker@rhodesokla.com
COLIN H. TUCKER, OBA 16325
chtucker@rhodesokla.com
KERRY R. LEWIS, OBA 16519
klewis@rhodesokla.com
AUSTIN T. JACKSON, OBA 33922
ajackson@rhodesokla.com
RHODES HIERONYMUS JONES TUCKER & GABLE
P.O. Box 21100
Tulsa, Oklahoma 74121-1100
(918) 582-1173; (918) 592-3390 (fax)
**Attorneys for Defendant, Tulsa Regional
Chamber**

Gerald M. Bender
gbender@cityoftulsa.org
Kristina L. Gray
kgray@cityoftulsa.org
T. Michelle McGrew
mmcgrew@cityoftulsa.org
R. Lawson Vaughn
lvaughn@cityoftulsa.org
Stephen A. Wangsgard
swangsgard@cityoftulsa.org
175 E. Second St., Suite 685
Tulsa, OK 74103
(918) 596-7717; (918) 596-9700 [fax]
Attorneys for City of Tulsa and TMAPC

Keith A. Wilkes, OBA 16750
kwilkes@hallestill.com
HALL ESTILL HARDWICK GABLE GOLDEN & NELSON
320 South Boston Avenue, Suite 200
Tulsa, Oklahoma 74103-3708
(918) 594-0400; (918) 594-0404 [fax]
**Attorney for Tulsa County Board of County
Commissioners and Sheriff Vic Regalado**

Jot Hartley
iothartley@gmail.com
Travis Hartley

travishartley@hartleylawfirm.com
THE HARTLEY LAW FIRM
P.O. Box 553
Vinita, OK 74301
(918) 256-2100; (918) 256-2121 [fax]
Attorneys for Tulsa Development Authority

Kevin L. McClure, OBA 12767
Kevin.mcclure@oag.ok.gov
Assistant Attorney General
Office of Oklahoma Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
(405) 521-3921; (405) 521-6246 [fax]
Attorney for Oklahoma Military Department

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of March, 2022, copies of the above and foregoing were sent to the following via U.S. Mail, correct postage fully prepaid:

Attorneys for Plaintiffs:

Damario Solomon-Simmons
Kymberli J. M. Heckenkemper
SOLOMON SIMMONS LAW
601 S. Boulder Ave., Suite 600
Tulsa, OK 74119

dss@solomonsimmons.com
kheckenkemper@solomonsimmons.com

J. Spencer Bryan
Steven J. Terrill
BRYAN & TERRILL
3015 E. Skelly Dr., Suite 400
Tulsa, OK 74105

jsbryan@bryanterrill.com
siterrill@bryanterrill.com

Eric J. Miller
919 Albany Street, Burns 307
Los Angeles, CA 90015

eric.miller@lls.edu

Maynard M. Henry, Sr.
10332 Main Street, Suite 308
Fairfax, Virginia 22030

mhenryesquire@cox.net

Lashandra Peoples-Johnson
Cordal Cephas
JOHNSON CEPHAS LAW

lashandra@johnsoncephaslaw.com
cordal@johnsoncephaslaw.com

3939 S. Harvard Ave., Suite 238
Tulsa, OK 74135

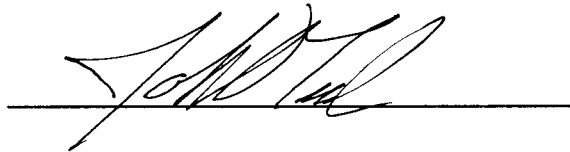
Michael E. Swartz
Angela Garcia
Victoria Harris
Ekenedilichukwu Ukabiala
Sara Elena Solfanelli
Randall Thomas Adams
Melanie S. Collins
Alexander Hammond Wharton
SCHULTE ROTH & ZABEL
919 Third Avenue
New York, NY 10022

McKenzie Haynes
SCHULTE ROTH & ZABEL
901 Fifteenth Street, NW, Suite 800
Washington, DC

Michael.swartz@srz.com

Victoria.harris@srz.com
keni.ukabiala@srz.com
sara.solfanelli@srz.com
Randall.adams@srz.com
Melanie.collins@srz.com
alex.wharton@srz.com

mckenzie.haynes@srz.com

A handwritten signature in black ink, appearing to read "A. Wharton", is written over a solid horizontal line.