IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

HENRY HODGES,

Plaintiff,

v.

LISA HELTON, in her official capacity as Tennessee's Interim Commissioner of Correction No. 22-1440-III

And

DR. KENNETH WILLIAMS, in his official capacity as Assistant Commissioner of Clinical Services, Chief Medical Officer Tennessee Department of Correction,

Defendants.

MOTION OF THE ASSOCIATED PRESS FOR EXPEDITED HEARING

Proposed Intervenor the Associated Press ("AP"), by and through undersigned counsel, hereby moves for an expedited hearing to be set on its concurrently filed Motion to Intervene for the Limited Purpose of Opposing Defendants' Motion for Protective Order. Specifically, AP requests that such expedited hearing be set by the Court for Monday, December 12, 2022 at 10:00 a.m. in conjunction with the previously scheduled hearing on Defendants' Motion for Protective Order. Plaintiff does not oppose the expedited hearing being scheduled in conjunction with the hearing on Defendants' Motion for Protective Order. Defendants oppose consolidating the hearing on their Motion for Protective Order

with AP's Motion to Intervene. A proposed Order setting such expedited hearing is attached, in accordance with Davidson County Local Rule 26.07.

Respectfully submitted,

/s/ Paul R. McAdoo

Paul R. McAdoo (BPR No. 034066) REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS 6688 Nolensville Rd., Suite 108-20 Brentwood, TN 37027 Phone: 615.823.3633 Facsimile: 202.795.9310 pmcadoo@rcfp.org

Counsel for Proposed Intervenor

CERTIFICATE OF SERVICE

The undersigned certifies that on December 8, 2022, a true and correct copy of the foregoing was served by email, as agreed by the parties:

Dean S. Atyia,
John R. Glover,
Steven J. Griffin,
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, TN 37202
Tel: (615) 741-8726
dean.atyia@ag.tn.gov
john.glover@ag.tn.gov
steven.griffin@ag.tn.gov

Robin Nunn
Justin Weitz
Michelle Arra
Emily Ahdieh
Morgan Lewis & Backius, LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004-2541
Tel: 202-739-3000
robin.nunn@morganlewis.com
justin.weitz@morganlewis.com
michelle.arra@morganlewis.com

Kelly J. Henry
Richard L. Tennent
Amy D. Harwell
Federal Public Defender for the
Middle District of Tennessee
810 Broadway, Suite 200
Nashville, TN 37203
Tel: (615) 736-5047
Kelley_Henry@fd.org
Richard_Tennent@fd.org
Amy_Harwell@fd.org

emily.ahdieh@morganlewis.com

s/ Paul R. McAdoo Counsel for Proposed Intervenor