

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

V.

CAUSE NO. 4:05cv33TSL-AGN

IKE BROWN, et al.

DEFENDANTS

**DEFENDANTS IKE BROWN AND THE NOXUBEE COUNTY EXECUTIVE
COMMITTEE'S RESPONSE IN OPPOSITION TO UNITED STATES' MOTION TO
STRIKE REDESIGNATION OF DEFENDANTS' EXPERT WITNESS**

COME NOW Defendants Ike Brown and the Noxubee County Executive Committee, by and through undersigned counsel, and respond in opposition to the United States' *Motion to Strike Redesignation of Defendants' Expert Witness* as follows, to-wit:

1. This Court continued the trial of this matter to January 16, 2007 and reset discovery deadlines on September 8, 2006.
2. Defendants designated an Expert Witness on October 2, 2006 and sent an expert report to Plaintiff.
3. Defendants request the court to deny Plaintiff's *Motion* to strike their expert designation for the reasons enumerated in the attached supporting *affidavit*.

WHEREFORE, Defendants respectfully plead this Court to deny Plaintiff's *Motion* in its entirety.

Submitted on this, the 27th day of October, 2006.

BY: /s/ Edward L. Pleasants, III

EDWARD L. PLEASANTS, III
(MSB # 101857)
**Counsel for Defendants Ike Brown
and The Noxubee County
Democratic Executive Committee**

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Edward L. Pleasants III, hereby certify that a copy of the foregoing document was served upon the following counsel of record by electronic means: Ellis Turnage, Esq., Christopher D. Hemphill, Esq., J. Christian Adams, Esq., Christopher Coates, Esq., and Joshua L. Rogers, Esq.

This document will be delivered by other means to:

Dunn Lampton, U.S. Attorney's Office
188 E. Capitol Street, Suite 500
Jackson, MS 39201.

This the 27th day of October, 2006.

/s/ Edward L. Pleasants III
Edward L. Pleasants III