

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON, MISSISSIPPI**

**JOHN ROBERT SMITH, SHIRLEY HALL
AND GENE WALKER**

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:01-CV-855-HTW-DCB

**DELBERT HOSEMANN, Secretary of State of
Mississippi; JIM HOOD, Attorney General for the State of
Mississippi; HAYLEY BARBOUR, Governor of the State
of Mississippi; MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE; and, MISSISSIPPI DEMOCRATIC
EXECUTIVE COMMITTEE**

DEFENDANTS

and

**BEATRICE BRANCH, RIMS BARBER,
L.C. DORSEY, DAVID RULE,
JAMES WOODWARD, JOSEPH P. HUDSON
and ROBERT NORVEL**

INTERVENORS

CONSOLIDATED WITH

KELVIN BUCK, ET AL.

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:11-CV-717-HTW-LRA

HALEY BARBOUR, ET AL.

DEFENDANTS

**RESPONSE OF THE MISSISSIPPI SECRETARY OF STATE
TO PROPOSED INTERVENORS' MOTION TO INTERVENE**

Mississippi Secretary of State Michael Watson respectfully requests the Court deny the Motion of the proposed Intervenors, Hester Jackson McCrary, Kelly Jacobs, and non-profit Mississippi Early Voting Initiative, to Intervene (Doc. 133) in this action. Because their Motion should be denied, their Rule 60(b)(6) Motion to Amend the Final Judgment of February 26, 2002, as Amended December 30, 2011, should be denied as moot.

In support of this Response, Secretary Watson is submitting simultaneously with this response a supporting brief, and incorporates all of the arguments stated in it as if fully stated here. Secretary Watson additionally adopts and incorporates the arguments made by the other parties opposing the intervention.

ACCORDINGLY, Secretary Watson respectfully requests the Court to deny the proposed Intervenor's Motion to Intervene (Doc. 133) in this action. Because their Motion should be denied, Secretary Watson also respectfully requests their Rule 60(b)(6) Motion to Amend the Final Judgment of February 26, 2002, as Amended December 30, 2011, be denied as moot. Secretary Watson requests any other relief the Court deems appropriate.

Respectfully submitted,

MICHAEL WATSON,
Secretary of State of Mississippi

By: /s/ William Trey Jones, III

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ATTORNEY FOR MICHAEL WATSON,
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CERTIFICATE OF SERVICE

I, William Trey Jones, III hereby certify that I electronically filed the above and foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

Dated: November 22, 2021

/s/ William Trey Jones, III
