

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

[1] MISTY WHITE,)
[2] JERMAINE BRADFORD,)
[3] JANARA MUSGRAVE,)
[4] LONDON PROUDFIT,)
[5] BRADLEY BARBER, JR., and)
[6] DAKOTA KAPPUS,)

On behalf of themselves and all)
others similarly situated, and)

[7] OKLAHOMA STATE)
CONFERENCE, NAACP,)

Plaintiffs,)

v.)

[1] HON. PAUL HESSE, in his official)
capacity as presiding District Court)
Judge,)

[2] HON. JACK MCCURDY,)
in his official capacity as District Court)
Judge,)

[3] HON. BARBARA HATFIELD,)
[4] HON. CHARLES GASS,)
[5] HON. KHRISTAN STRUBHAR, in their)
official capacities as Special District)
Judges in the Canadian County District)
Court, and)

[6] CANADIAN COUNTY DISTRICT)
COURT, 26TH JUDICIAL DISTRICT,)

Defendants.)
_____)

Case No. CIV-19-1145-R
(Class Action)

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

For the reasons that will be set forth in Plaintiffs' Brief in Support of Motion for Class Certification, attached below, Plaintiffs request that this Court certify a class and a subclass, pursuant to Fed. R. Civ. P. 23(b)(2), composed of:

Primary Class: All arrestees who are detained by Canadian County from the time of the filing of the Complaint through the final resolution of this case, for whom a secured financial condition of release has been set, without the presence of counsel, and who cannot afford the amount necessary for release on the secured money bail.

Disability Subclass: All arrestees with a disability, as defined in the Americans with Disabilities Act and Rehabilitation Act, who are detained by Canadian County from the time of the filing of the Complaint through the final resolution of this case, for whom a secured financial condition of release has been set, without the presence of counsel, and who cannot afford the amount necessary for release on the secured money bail.

Respectfully Submitted,

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*Applications for admission pro hac vice pending

Dated: December 10, 2019

CERTIFICATE OF SERVICE

I affirm that this motion for class certification and supporting brief will be served concurrently with the service of the Summons and Complaint in this matter.

/s/ Amia L. Trigg
Amia L. Trigg