

IN THE SUPERIOR COURT OF MUSCOGEE COUNTY
STATE OF GEORGIA

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LINDA PIERCE, Clerk of Superior,)
State, and Juvenile Courts of)
Muscogee County, and the)
Columbus Board of Equalization,)
)
)
Plaintiff,)
)
v.)
)
COLUMBUS, GEORGIA, et. al.,)
)
Defendants.)

LINDA PIERCE
MUSCOGEE COUNTY
SUPERIOR COURT

Civil Action Number:
SU14CV3472

DEFENDANTS' CONSOLIDATED
MOTION FOR SUMMARY JUDGMENT

COME NOW all Defendants in this action and, pursuant to Uniform Superior Court Rule 6.5 and O.C.G.A. § 9-11-56, hereby move for summary judgment on all claims, respectfully showing the Court the following:

1.

There is no genuine issue of material fact and Defendants are entitled to judgment as a matter of law. O.C.G.A. § 9-11-56.

2.

In support of this Motion, Defendants rely on the following:

- (a) The pleadings;
- (b) The deposition of Linda Pierce, filed herewith;

(c) Defendants' Statement of Undisputed Facts and Theories to Deny Recovery, filed herewith;

(d) Defendants' Consolidated Brief in Support of their Motion for Summary Judgment, filed herewith; and

(e) All other materials of record.

WHEREFORE, Defendants respectfully request that the Court inquire into and **GRANT** their Motion for Summary Judgment.

Respectfully submitted, this 25th day of January, 2016.

PAGE, SCRANTOM, SPROUSE,
TUCKER & FORD, P.C.

By: _____

James C. Clark, Jr.

Ga. Bar No.: 127145

Alan G. Snipes

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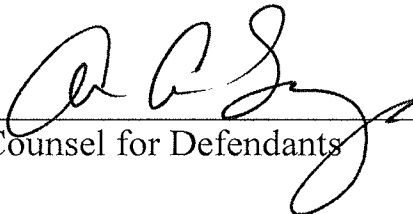
CERTIFICATE OF SERVICE

I do hereby certify that I am counsel for Defendants and that a true and exact copy of the foregoing document has been served upon counsel of record in the within matter by email, as follows:

William S. Stone
Boone & Stone
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David Wm. Boone
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This 29th day of January, 2016.



Counsel for Defendants