

**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**

**THE MISSISSIPPI SECRETARY OF STATE'S JOINDER IN THE  
MISSISSIPPI REPUBLICAN PARTY EXECUTIVE COMMITTEE'S MEMORANDUM  
OF AUTHORITIES IN SUPPORT OF THE  
MOTION TO VACATE INJUNCTION AND FOR OTHER RELIEF**

Mississippi Secretary of State Michael Watson joins in the Mississippi Republican Party Executive Committee's memorandum of authorities in support of the pending motion to vacate injunction and for other relief filed this day (Dkt. 156). Consistent with this Court's direction to avoid repetition of argument, 2/2/22 Tr. 46-47, the Secretary of State adopts and incorporates the arguments and grounds for relief set forth in the Committee's memorandum.

Dated: February 14, 2022

Respectfully submitted,

**MICHAEL WATSON,**  
**Secretary of State of Mississippi**

By: /s/ William Trey Jones, III

OF COUNSEL:

William Trey Jones, III, MSB No. 99185

Matthew W. Allen, MSB No. 101605

BRUNINI, GRANTHAM, GROWER & HEWES, PLLC

190 East Capitol Street, Suite 100

Jackson, Mississippi 39201

Telephone: (601) 948-3101

Telecopier: (601) 960-6902

[tjones@brunini.com](mailto:tjones@brunini.com)

[mwallen@brunini.com](mailto:mwallen@brunini.com)

**ATTORNEY FOR MICHAEL WATSON,**  
**SECRETARY OF STATE OF MISSISSIPPI**

**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: February 14, 2022

/s/ William Trey Jones, III