

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION

SEP 15 2003

JAMES W. McCORMACK, CLERK
By: _____
DEP CLERK

JERRY HART and ANDRE DYER

PLAINTIFFS

v.

⁵⁷⁶
No. 4:02CV00251JTR

CITY OF LITTLE ROCK

DEFENDANT

PLAINTIFFS' MOTION FOR PERMANENT INJUNCTION AND TO SEAL RECORD

Come the Plaintiffs, Jerry Hart and Andre Dyer, by and through their respective attorneys, Samuel A. Perroni & Patrick R. James, and for their Motion state:

1. On September 12, 2003, a unanimous jury returned a verdict in favor of Plaintiffs Jerry Hart and Andre Dyer.
2. Included in the relief sought by Plaintiffs was the entry of a permanent injunction prohibiting further dissemination of police officers' personnel files by the Defendant City of Little Rock.
3. Consistent with the jury's verdict, Plaintiffs move this Court for entry of a permanent injunction pursuant to Rule 65 prohibiting the further dissemination of police officers' personnel files.
4. Further, Plaintiffs move to seal the record in this case as to Plaintiffs' Exhibits 2 and 3 and Plaintiffs' Deposition Exhibits 2 and 3, which consist of Plaintiffs' personnel files.

WHEREFORE, Plaintiffs Jerry Hart and Andre Dyer pray that their Motion for Permanent Injunction and to Seal Record be granted and for all other just and proper relief to which they may be entitled.

Respectfully submitted,



SAMUEL A. PERRONI, Ark. Bar #74119

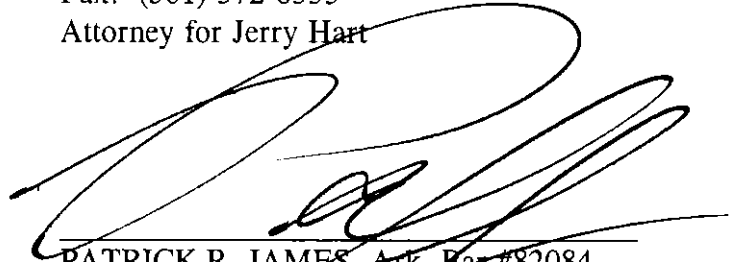
801 West Third Street

Little Rock, AR 72201-2103

Phone: (501) 372-6555

Fax: (501) 372-6333

Attorney for Jerry Hart



PATRICK R. JAMES, Ark. Bar #82084

801 West Third Street

Little Rock, AR 72201-2103

Phone: (501) 372-6555

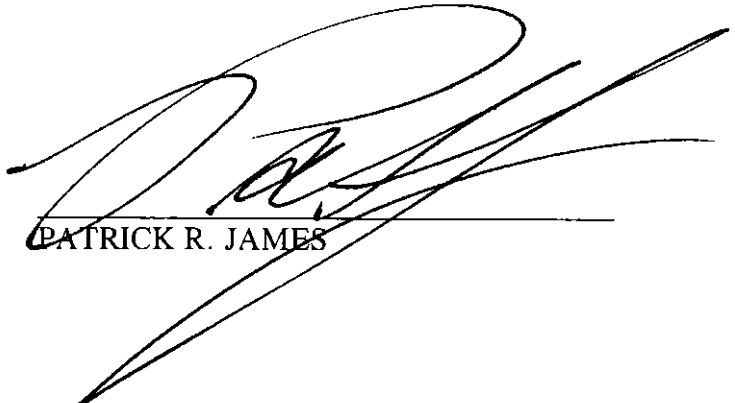
Fax: (501) 372-6333

Attorney for Andre Dyer

CERTIFICATE OF SERVICE

I, Patrick R. James, hereby certify that a true and correct copy of the foregoing has been served, via U. S. Mail, postage prepaid, on this 15th day of September, 2003, to:

Thomas M. Carpenter
Little Rock City Attorney's Office
500 West Markham Street, Suite 310
Little Rock, AR 72201



PATRICK R. JAMES