

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

Case No. 5:10-CV-00265-H

MICHAEL BATEMAN, VIRGIL GREEN, )  
FORREST MINGES, JR., GRNC/FFE, INC., )  
and SECOND AMENDMENT )  
FOUNDATION, INC., )

Plaintiffs, )

v. )

BEVERLY PERDUE, REUBEN F. YOUNG, )  
STOKES COUNTY, and CITY OF KING, )

Defendants. )

**DEFENDANT STOKES COUNTY'S**  
**MEMORANDUM OF LAW IN**  
**SUPPORT OF ITS MOTION FOR**  
**SUMMARY JUDGMENT**

Defendant Stokes County adopts by reference as if fully set forth herein, in support of its Motion for Summary Judgment, the arguments set forth in the State Defendants' Brief in Support of the State Defendants' Motion for Summary Judgment. In further support of its Motion for Summary Judgment, Stokes County incorporates herein by reference the arguments in its Memorandum of Law previously submitted in support of its Motion to Dismiss, as well as the Affidavit of Jimmy Walker which is being filed contemporaneously herewith.

WHEREFORE, for the reasons set forth herein, in the State Defendants' Brief in Support of the State Defendants' Motion for Summary Judgment, and in Defendant Stokes County's previously filed Memorandum of Law in support of its Motion to Dismiss, Defendant Stokes County moves that its Motion for Summary Judgment be granted and that Plaintiffs' Complaint be dismissed with prejudice.



CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the foregoing Memorandum of Law with the Clerk of Court using the CM/ECF system which will serve notification of such filing on the following:

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This the 16th day of December, 2010.

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/s/ Lori P. Jones  
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