

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF LOUISIANA

OFFICER JOHN FORD

v.

DERAY MCKESSON AND  
BLACK LIVES MATTER

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CIVIL NO.:

16-CR-742-BAJ-RLB

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**DEFENDANT DERAY MCKESSON’S STATEMENT OF MATERIAL FACTS IN  
SUPPORT OF HIS MOTION FOR SUMMARY JUDGMENT**

NOW INTO COURT, through undersigned counsel, comes defendant DeRay Mckesson, who respectfully submits the following statement of material facts as to which there is no genuine issue of material fact to be tried.

1. There is no evidence that Mr. Mckesson organized the protest held in Baton Rouge, Louisiana on July 9, 2016. *See* Ford Depo. Tr., attached as Ex. “A” to Mckesson’s Motion for Summary Judgment, p. 13, l. 22-25; p. 14, l. 1-5; and p. 16, l. 1-12.

2. Mr. Mckesson did not engage in any acts of violence at the protest held in Baton Rouge, Louisiana on July 9, 2016. *See id.* at p. 43, l. 6-17.

3. Mr. Mckesson did not direct anyone to commit acts of violence at the protest held in Baton Rouge, Louisiana on July 9, 2016. *See id.* at p. 38, l. 15-20; p. 43, l. 6-17.

Respectfully submitted,

/s/ William P. Gibbens

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon opposing counsel of record this 31st day of January, 2024, by e-filing same into the CM/ECF system which will automatically deliver a copy of same to all counsel.

/s/ William P. Gibbens  
WILIAM P. GIBBENS