

WHEREFORE, Luzerne County Defendants respectfully request this Court grant their Motion to Dismiss.

Respectfully submitted,

/s/ John G. Dean

John G. Dean

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Attorney for Defendants Luzerne
County Council, Tim McGinley and
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DATED: January 31, 2022

CERTIFICATE OF SERVICE

I, John G. Dean, hereby certify that I have caused to be served on this day a true and correct copy of Luzerne County Defendants' Motion to Dismiss via ECF on all counsel of record.

DATED: January 31, 2022

/s/John G. Dean

John G. Dean