

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHIGAN WELFARE RIGHTS)	
ORGANIZATION, NAACP,)	
MAUREEN TAYLOR, NICOLE L.)	
HILL, and TEASHA K. JONES,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Case No. 1:20-cv-03388-EGS
)	
DONALD J. TRUMP;)	
DONALD J. TRUMP FOR)	
PRESIDENT, INC.; and)	
REPUBLICAN NATIONAL)	
COMMITTEE,)	
)	
<i>Defendants.</i>)	
)	

**MOTION TO DISMISS ON BEHALF OF DEFENDANTS DONALD J. TRUMP
AND DONALD J. TRUMP FOR PRESIDENT, INC.**

Pursuant to Federal Rules of Civil Procedure 12(b)(1), (2), and (6), Defendants Donald J. Trump and Donald J. Trump for President, Inc., hereby move to dismiss Plaintiffs’ amended complaint which invokes 52 U.S.C. §10307(b) (“Section 11(b)”) of the Voting Rights Act and 42 U.S.C. §1985(3). Plaintiffs seek monetary damages as well as declaratory and injunctive relief for which they have failed to state a claim under any constitutionally sound interpretation of the law. Plaintiffs provide no legal authority to support their broad-sweeping and constitutionally infirm interpretation of these important civil rights statutes. Moreover, Plaintiffs cannot establish that this Court is authorized to exercise jurisdiction over Defendants. Defendants are not subject to general jurisdiction in the District of Columbia. Any effort to subject

Defendants to this Court's specific jurisdiction based on their constitutionally protected activities cannot comport with the limits imposed on the District of Columbia by federal due process. Finally, to the extent that Plaintiffs seek declaratory and injunctive relief on behalf of voters "in any other state," Plaintiffs requested injunction is overbroad as Plaintiffs do not have standing to obtain relief on behalf of voters in other states.

For these reasons and for the reasons more fully laid out in the attached memorandum in support of this motion, this Court should dismiss Plaintiffs' Amended Complaint.

Dated: February 24, 2021

Respectfully submitted,

/s/ Jesse R. Binnall
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*Attorney for Donald J. Trump and
Donald J. Trump for President, Inc.*

CERTIFICATE OF SERVICE

I certify that on February 24, 2021, I electronically filed the foregoing Motion to Dismiss with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel and parties of record.

Dated: February 24, 2021

/s/ Jesse R. Binnall

Jesse R. Binnall

*Attorney for Donald J. Trump and
Donald J. Trump for President, Inc.*