

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
TALLAHASSEE DIVISION**

FLORIDA STATE CONFERENCE OF  
BRANCHES AND YOUTH UNITS OF  
THE NAACP, *et al.*,

Plaintiffs,

v.

LAUREL M. LEE, in her official  
capacity as Secretary of State of  
Florida, *et al.*,

Defendants,

and

NATIONAL REPUBLICAN  
SENATORIAL COMMITTEE, *et al.*,

Intervenor-Defendants.

Case No. 4:21-cv-187

**SECRETARY OF STATE LEE'S**  
**MOTION TO DISMISS**

Secretary of State Laurel M. Lee moves to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) the following Claims in *NAACP, et al. v. Lee, et al.*, No. 4:21-cv-00187: Count I, Count II, Count III, Count V, Count VI, Count VII, Count VIII, and Count IX. The Secretary of State's arguments are fully set forth in the attached Omnibus Memorandum in Support of the Secretary's Motion to Dismiss.

Respectfully submitted by:

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Dated: June 25, 2021

**NORTHERN DISTRICT OF FLORIDA**  
**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(D), a conference was not conducted as the relief requested herein will determine the outcome of several of Plaintiffs' claims.

**LOCAL RULE 7.1(F) CERTIFICATION**

Pursuant to Local Rule 7.1(F), the attached Omnibus Memorandum in Support of the Secretary's Motion to Dismiss Plaintiffs' Claims contains 11,907 words, excluding the case style, signature block, and any certificate of service.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to all counsel of record through the Court's CM/ECF system on the 25th of June, 2021.

*/s/ Mohammad Jazil*  
Attorney for Defendant Secretary Lee