

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

LEAGUE OF WOMEN VOTERS OF  
FLORIDA, INC., LEAGUE OF  
WOMEN VOTERS OF FLORIDA  
EDUCATION FUND, INC., LEAGUE  
OF UNITED LATIN AMERICAN  
CITIZENS, BLACK VOTERS  
MATTER FUND, INC., FLORIDA  
ALLIANCE FOR RETIRED  
AMERICANS, INC., CECILE  
SCOON, SUSAN ROGERS, DR.  
ROBERT BRIGHAM, and ALAN  
MADISON,

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-186-MW-MAF

**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 *League of Women Voters, et al. v. Lee, et al.*, No. 4:21-cv-186: Count I and Count IV. 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: July 30, 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) and this Court's order, the attached Omnibus Memorandum in Support of the Secretary's Motion to Dismiss Plaintiffs' Claims contains 11,235 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 30th of June, 2021.

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