

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

HARRIET TUBMAN FREEDOM
FIGHTERS, *et al.*,

Plaintiffs,

v.

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

Defendants,

Case No. 4:21-cv-242

**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 Claim in *Harriet Tubman Freedom Fighters, Corp. et al., v. Lee, et al.*, No. 4:21-cv-242: 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 July, 2021.

/s/ Mohammad Jazil
Attorney for Defendant Secretary Lee