

**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. 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:

BRADLEY R. MCVAY (FBN 79034)

General Counsel

Brad.McVay@dos.myflorida.com

ASHLEY E. DAVIS (FBN 48302)

Deputy General Counsel
Ashley.Davis@dos.myflorida.com
Florida Department of State
R.A. Gray Building Suite 100
500 South Bronough Street
Tallahassee, Florida 32399-0250
Phone: (850) 245-6536
Fax: (850) 245-6127

/s/ Mohammad Jazil
MOHAMMAD O. JAZIL (FBN 72556)
mjazil@holtzmanvogel.com
GARY V. PERKO (FBN 855898)
gperko@holtzmanvogel.com
HOLTZMAN VOGEL BARAN TORCHINSKY
& JOSEFIK, PLLC
2300 N. Street N.W., Ste. 643-A
Washington, D.C. 20037
Phone: (202) 737-8808
Fax: (540) 341-8809

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