

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

DEBORAH SPRINGER SUTTLAR, JUDY GREEN, FRED LOVE, in his individual and official capacity as State Representative, KWAMI ABDUL-BEY, CLARICE ABDUL-BEY, and PAULA WITHERS,

Plaintiffs,

v.

JOHN THURSTON, in his official capacity as the Secretary of State of Arkansas and in his official capacity as the Chairman of the Arkansas State Board of Election Commissioners; and SHARON BROOKS, BILENDA HARRIS-RITTER, WILLIAM LUTHER, CHARLES ROBERTS, WENDY BRANDON, JAMIE CLEMMER and JAMES HARMON SMITH III, in their official capacities as members of the Arkansas State Board of Election Commissioners,

Defendants.

Case No. 4:22-cv-368-KGB

**PLAINTIFFS' MOTION FOR REMAND**

Plaintiffs Deborah Springer Suttlar, Judy Green, Fred Love, Kwami Abdul-Bey, Clarice Abdul-Bey, and Paula Withers, for their motion to remand pursuant to 28 U.S.C. § 1447(c), state:

1. This Court lacks jurisdiction over this matter, which solely raises state constitutional challenges to a state law.

2. There is no basis for removal under 28 U.S.C. § 1443(2) or § 1441(a). The reasons for remand are set out more fully in the supporting brief filed contemporaneously herewith.

WHEREFORE, and for the reasons set forth in the accompanying brief, Plaintiffs respectfully request that the Court:

1. Grant Plaintiffs' Motion for Remand and remand this case to the Circuit Court of Pulaski County, Arkansas;
2. Award Plaintiffs the costs of this action and attorneys' fees permitted under 28 U.S.C § 1447(c) and any other applicable law; and
3. Grant Plaintiffs such other and further relief as the Court deems just and proper.

Respectfully submitted,

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*\*Motion for Pro Hac Vice Admission  
Forthcoming*