

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

)	
PAUL GOLDMAN, <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 3:22cv789
)	
GLENN YOUNGKIN, <i>in his official capacity, et al.</i>,)	
)	
Defendants.)	
)	

**DPVA DEFENDANTS’ MOTION TO DISMISS PLAINTIFFS’ SECOND AMENDED
COMPLAINT PURSUANT TO RULES 12(B)(1) AND 12(B)(6) OF THE FEDERAL
RULES OF CIVIL PROCEDURE**

Defendants Democratic Party of Virginia, Susan Swecker, Chairwoman of the Democratic Party of Virginia, in her official capacity, and Alexis Rodgers, Chairwoman of the 4th Congressional District Democratic Committee Party, in her official capacity, by counsel, respectfully move this Court to dismiss, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, the Second Amended Complaint filed herein by Plaintiffs for the reasons stated in the Memorandum in Support being filed herewith.

WHEREFORE, Democratic Party of Virginia, Susan Swecker, Chairwoman of the Democratic Party of Virginia, in her official capacity, and Alexis Rodgers, Chairwoman of the 4th Congressional District Democratic Committee Party, in her official capacity, by counsel, respectfully request that this Court dismiss Plaintiffs claims in their entirety and award them any additional relief deemed appropriate by the Court.

Respectfully submitted,

Democratic Party of Virginia, Susan Swecker, Chairwoman of the Democratic Party of Virginia, in her official capacity, and **Alexsis Rodgers**, Chairwoman of the 4th Congressional District Democratic Committee Party, in her official capacity

Date: January 31, 2023

By: /s/ Ariel L. Stein
Counsel

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CERTIFICATE

I hereby certify that on the 31st day of January, 2023, I caused the foregoing to be electronically filed with the Clerk of this Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

By: /s/ Ariel L. Stein
Ariel L. Stein

Counsel for Democratic Party of Virginia, Susan Swecker, Chairwoman of the Democratic Party of Virginia, in her official capacity, and Alexsis Rodgers, Chairwoman of the 4th Congressional District Democratic Committee Party, in her official capacity