

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

LEAGUE OF WOMEN VOTERS OF NEW  
HAMPSHIRE, *et al.*,

Plaintiffs,

v.

STEVE KRAMER, *et al.*,

Defendants.

Civil Action No. 1:24-cv-00073-SM-TSM

**DEFENDANT LINGO TELECOM, LLC'S MOTION TO DISMISS**

Pursuant to Federal Rule of Procedure Rule 12(b)(6) and Local Rule 7.1, Defendant Lingo Telecom, LLC ("Lingo") respectfully moves for the dismissal of all claims against it for failure to state a claim.

For the reasons set forth in the accompanying Memorandum, Plaintiffs have not and cannot allege a plausible claim for relief against Lingo. Accordingly, Plaintiffs' claims against Lingo should be dismissed with prejudice.

In light of the dispositive nature of this Motion to Dismiss, the concurrence requirement of Local Rule 7.1(c) does not apply.

WHEREFORE, Lingo respectfully requests that this Honorable Court:

- A. Enter an Order dismissing all claims against Lingo with prejudice; and
- B. Grant such other and further relief as justice may require.

May 6, 2024

Respectfully submitted,

/s/ Thomas M. Johnson, Jr.

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### CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 6, 2024, the foregoing was electronically filed with the Court and served upon the following:

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