

**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 THE AMENDED COMPLAINT**

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 alleged and cannot allege a plausible claim for relief against Lingo. Accordingly, Plaintiffs' claims against Lingo in the amended complaint, *see* ECF No. 65, 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.

June 25, 2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 25, 2024, the foregoing was electronically filed with the Court and served upon the following:

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