

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

**JACKIE WILLIAMS SIMPSON *ET AL***

**PLAINTIFFS**

**V.**

**No. 4:22-CV-213-JM-DRS-DPM**

**JOHN THURSTON, in his official capacity  
As Secretary of State of the State of Arkansas**

**DEFENDANT**

**PLAINTIFFS' RESPONSE TO  
DEFENDANT'S MOTION TO DISMISS  
FILED DECEMBER 16, 2022**

Come the Plaintiffs, and for their Response to the Defendant, John Thurston's, Motion to Dismiss, state that they deny that the Defendant is entitled to a dismissal of the Complaint for the reasons contained in the Brief In Support of Plaintiffs' Response to Motion to Dismiss filed contemporaneously herewith.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on the date of filing of this Response to Motion to Dismiss, a copy of the same was served upon counsel of record for the Defendant by and through the Court's electronic filing and service system, and by electronic mail addressed to:

Dylan L. Jacobs, Esq.  
Deputy Solicitor General  
Office of the Arkansas Attorney General  
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Dated: December 26, 2022.

/s/ Richard H. Mays  
Richard H. Mays