

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

<b>SISTERREACH, INC., et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 2:24-cv-02446-SHR-tmp</b>
	)	<b>District Judge Sheryl H. Lipman</b>
<b>JONATHAN SKRMETTI, et al.,</b>	)	<b>Magistrate Judge Tu M. Pham</b>
	)	
<b>Defendants.</b>	)	

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**DEFENDANTS' MOTION TO DISMISS**

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Defendants Jonathan Skrmetti, Steven Finney, Barry Staubus, Dan Armstrong, Jimmy Dunn, Ryan Desmond, Charne Allen, Dave Clark, Jared Effler, Russell Johnson, Shari Tayloe, Coty Wamp, Courtney Lynch, Bryant Dunaway, Craig Northcott, Jason Lawson, Jennings Jones, Robert Carter, Ray Whitley, Robert Nash, Glenn Funk, Stacey Edmonson, Brent Cooper, Ray Crouch, Neil Thompson, Mark Davidson, Jody Pickens, Colin Johnson, Frederick Agee, Danny Goodman, Steve Mulroy, Chris Stanford, and Hans Schwendimann, all in their official capacities ("Defendants"), by and through counsel, and pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, respectfully request that Plaintiffs' complaint against them be dismissed.

As discussed more fully in Defendants' separate memorandum of law, Plaintiffs fail to state a claim upon which relief can be granted under either the First Amendment or Fourteenth Amendment to the United States Constitution. Plaintiffs also lack standing, and they cannot overcome Defendants' entitlement to sovereign immunity. Abstention principles likewise warrant dismissal.

Accordingly, Defendants respectfully request the Court to grant their motion and to dismiss each of Plaintiffs' claims against them as a matter of law.

Respectfully submitted,

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Attorney General and Reporter

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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 17, 2024, a copy of the foregoing document was filed using the Court's electronic court-filing system, which sent notice to the following counsel:

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