

MAXWELL KADEL,)	
)	
)	
Plaintiff,)	
)	
v.)	
)	
JASON FLECK, <i>et al.</i> ,)	
)	
Defendants.)	
)	
)	
)	

**NORTH CAROLINA
DEPARTMENT OF PUBLIC
SAFETY’S
MOTION FOR SUMMARY
JUDGMENT
[Fed. R. Civ. P. 56]**

NCDPS specifically contends that the record establishes as a matter of law that it did not violate Plaintiff, Dana Caraway’s (“Caraway”), Title VII rights or any of Caraway’s other constitutional or legal rights. NCDPS is also entitled to prevail as a matter of law based upon Caraway’s lack of standing. NCDPS’s arguments and legal authorities in support of this Motion are set forth in detail in the Memorandum of Law being filed by

NCDPS simultaneously with this Motion. NCDPS relies further on the Declaration of Wayne Goodwin, the Appendix to the Memorandum of Law, and the attached Exhibits which NCDPS is filing herewith in support of this Motion.

WHEREFORE, based upon the above and the arguments and authorities set forth in NCDPS's Memorandum of Law and the Memoranda of Law of the other Defendants, NCDPS respectfully requests that this Motion for Summary Judgment be allowed, and that all claims against it in this action be dismissed.

Respectfully submitted, this 30th day of November, 2021.

JOSHUA H. STEIN
Attorney General

/s/ James B. Trachtman

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CERTIFICATE OF SERVICE

I hereby certify that on the date indicated above, I electronically filed the foregoing **NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY'S MOTION FOR SUMMARY JUDGMENT** with the Clerk of the Court using the CM/ECF system which will provide electronic notification to counsel.

DATED: November 30, 2021.

/s/ James B. Trachtman
James B. Trachtman
Special Deputy Attorney General