

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**ROBERT EARL COUNCIL, a/k/a
KINETIK JUSTICE, et al.,**

Plaintiffs,

V.

KAY IVEY, et al.,

Defendants.

CIVIL ACTION NO.:

2:23-cv-00712-CLM-JTA

**DEFENDANTS SL ALABAMA, LLC’S, JU-YOUNG MANUFACTURING
AMERICA, INC.’S AND HWASEUNG AUTOMOTIVE USA LLC’S
MOTION TO DISMISS PLAINTIFFS’ CLASS ACTION COMPLAINT**

COME NOW Defendants SL Alabama, LLC, Ju-Young Manufacturing America, Inc., and Hwaseung Automotive USA LLC (“Automotive Defendants”), pursuant to Rule 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, and hereby move this Court to dismiss Plaintiffs’ Class Action Complaint, (ECF No. 1), for lack of standing and because it contains causes of action that fail to state a claim upon which relief may be granted. In support of this Motion, the Automotive Defendants rely on the Memorandum of Law filed contemporaneously herewith.

s/ Michael L. Lucas

Michael L Lucas

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and Ju-Young Manufacturing, LLC*

CERTIFICATE OF SERVICE

I certify that on March 29, 2024, I electronically filed the foregoing with the Clerk of the Court through the CM/ECF system, which will automatically generate notice of such filing to the attorneys of record.

s/ Michael L. Lucas
Michael L. Lucas

*One of the Attorneys for Defendants
SL Alabama, LLC, Hwaseung
Automotive and Ju-Young
Manufacturing, LLC*