

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

<b>KIERAN RAVI BHATTACHARYA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 3:19-CV-54-NKM-JCH</b>
	)	
	)	
<b>JAMES B. MURRAY, JR., et al.,</b>	)	
	)	
<b>Defendants.</b>	)	
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**DEFENDANTS' RULE 12(B)(6) MOTION TO  
DISMISS FIRST AMENDED COMPLAINT**

Defendants, James B. Murray, Jr., Whittington W. Clement, Robert M. Blue, Mark T. Bowles, L.D. Britt, Frank M. Conner, III, Elizabeth M. Cranwell, Thomas A. Depasquale, Barbara J. Fried, John A. Griffin, Louis S. Haddad, Robert D. Hardie, Maurice A. Jones, Babur B. Lateef, Angela Hucles Mangano, C. Evans Poston, Jr., James V. Reyes, Peter C. Brunjes, Timothy Longo Sr., Melissa Fielding, John J. Densmore, Jim B. Tucker, Christine Peterson, Nora Kern, and Sara K. Rasmussen, by counsel, respectfully move this Court to grant its Motion to Dismiss with prejudice under Rule 12(b)(6) of the Federal Rules of Civil Procedure. The accompanying memorandum in support sets forth Defendants' request for relief.

A proposed Order is attached for this Court's consideration.

Respectfully submitted,

JAMES B. MURRAY, JR., WHITTINGTON W. CLEMENT, ROBERT M. BLUE, MARK T. BOWLES L.D. BRITT, FRANK M. CONNER III, ELIZAETH M. CRANWELL, THOMAS A. DEPASQUALE, BARBARA J. FRIED, JOHN A. GRIFFIN, LOUIS S. HADDAD, ROBERT D. HARDIE, MAURICE A. JONES, BABUR B. LATEEF, ANGELA HUCLES MANGANO, C. EVANS POSTON JR., JAMES V. REYES, PETER C. BRUNJES, TIMOTHY LONGO SR., MELISSA FIELDING, JOHN J. DENSMORE, JIM B. TUCKER, CHRISTINE PETERSON, NORA KERN, and SARA K. RASMUSSEN

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Attorney General of Virginia

SAMUEL T. TOWELL  
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/s/ Madeline M. Gibson  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of March, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and that a notice of electronic filing will be delivered via the CM/ECF system to all counsel of record.

*/s/ Madeline M. Gibson*  
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