

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Anmarie Calgaro,

Plaintiff,

v.

St. Louis County et al.,

Defendants.

Case No. 16-cv-3919 (PAM/LIB)

**ST. LOUIS COUNTY AND LINNEA MIRSCH'S MOTION FOR
JUDGMENT ON THE PLEADINGS AND SUMMARY JUDGMENT**

St. Louis County and Linnea Mirsch hereby move the Court for an order granting them judgment on the pleadings under Fed. R. Civ. P. 12(c) on the grounds that Anmarie Calgaro's Verified Complaint for Declaratory Relief and Injunction (Docket No. 1) fails to state a claim upon which relief can be granted and granting them summary judgment under Fed. R. Civ. P. 56 on the grounds that there is no genuine dispute as to any material fact and they are entitled to judgment as a matter of law. The motion is based on a forthcoming memorandum of law, one or more supporting declarations, and all of the files, records, and proceedings herein.

Dated: December 9, 2016

Respectfully submitted,

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ST. LOUIS COUNTY ATTORNEY

s/ Nick D. Campanario

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Linnea Mirsch, in her individual and official
capacities