

**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  
MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF  
ANMARIE CALGARO'S MOTION FOR SUMMARY JUDGMENT**

The memorandum of law submitted by Anmarie Calgaro in support of her motion for summary judgment does not address her due-process claims against St. Louis County or her related claims against Linnea Mirsch, the alleged interim director of the St. Louis County Department of Public Health and Human Services.\* (Docket No. 46.) Because Calgaro has presented no argument regarding these claims, let alone an argument that satisfies her initial burden as a plaintiff-movant under Rule 56 of the Federal Rules of Civil Procedure, the motion should be denied to the extent it is directed toward the county and Mirsch.

---

\* The Court's Amended Order regarding dispositive-motion practice prohibits Calgaro from addressing the claims for the first time in her reply memorandum. (*See* Docket No. 5 ¶ 4 (providing that “[a] reply memorandum shall not raise new grounds for relief or present matters that do not relate to the [responding party’s] response”).)

Dated: January 5, 2017

Respectfully submitted,

MARK S. RUBIN  
ST. LOUIS COUNTY ATTORNEY

s/ Nick D. Campanario

Nick D. Campanario (#0316179)

Assistant County Attorney

St. Louis County Attorney's Office

St. Louis County Courthouse

100 North Fifth Avenue West, Room 501

Duluth, Minnesota 55802-1298

Telephone: (218) 726-2323

Fax: (218) 726-2332

campanarion@stlouiscountymn.gov

Attorney for Defendants St. Louis County and  
Linnea Mirsch, in her individual and official  
capacities

**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)

**CERTIFICATE OF COMPLIANCE UNDER D. MINN. LR 7.1(f)(2)**

I, Nick D. Campanario, affirm that St. Louis County and Linnea Mirsch's Memorandum of Law in Opposition to Plaintiff Anmarie Calgaro's Motion for Summary Judgment complies with the word-count limits in D. Minn. LR 7.1(f) and the type-size limits in D. Minn. LR 7.1(h). The memorandum contains 150 words. In calculating the number of words in the memorandum, I relied on the word-count function of my word-processing software, Microsoft® Office Word 2007. I certify that the function was applied specifically to include all text, including headings, footnotes, and quotations.

Dated: January 5, 2017

Respectfully submitted,

s/ Nick D. Campanario

Nick D. Campanario (#0316179)

Assistant County Attorney

St. Louis County Attorney's Office

St. Louis County Courthouse

100 North Fifth Avenue West, Room 501

Duluth, Minnesota 55802-1298

Telephone: (218) 726-2323

Fax: (218) 726-2332

campanario@stlouiscountymn.gov

Attorney for Defendants St. Louis County and  
Linnea Mirsch, in her individual and official  
capacities