

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
NO. 3:22-cv-191

KANAUTICA ZAYRE-BROWN,)
)
Plaintiff,)
)
v.)
)
NORTH CAROLINA DEPARTMENT OF)
PUBLIC SAFETY, et al.,)
)
Defendant.)

**DEFENDANTS' MOTION TO
DISMISS**

NOW COME Defendants, through the undersigned counsel, and pursuant to Rules 12(b)(1), (2), & (6) of the Federal Rules of Civil Procedure, to move this Court to enter an order dismissing, with prejudice, Plaintiff's Complaint. In support of this Motion, Defendants rely on the legal authority and arguments set forth in the supporting brief being contemporaneously filed herewith.

Respectfully submitted this ___ day of June, 2022.

**JOSHUA H. STEIN
ATTORNEY GENERAL**

/s/ Orlando L. Rodriguez
Orlando L. Rodriguez
Special Deputy Attorneys General
N.C. Department of Justice
Bar No. 43167
orodriguez@ncdoj.gov

/s/ Stephanie A. Brennan
Stephanie A. Brennan
Special Deputy Attorney General
N.C. Department of Justice
Bar No. 35955
sbrennan@ncdoj.gov

Attorneys for Defendants