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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

JAYLYN WESTENBROEK, HANNAH,)
HOLTMEIER, ALLISON COGHAN, GRACE)
CHOATE, MADELINE RAMAR, and MEGAN)
KOSAR, on behalf of themselves and)
derivatively on behalf of KAPPA KAPPA)
GAMMA FRATERNITY,)
)
)
Plaintiffs,)

v.)

Civil Action No.: 23-CV-00051-ABJ

)
KAPPA KAPPA GAMMA FRATERNITY, an)
Ohio non-profit corporation, as a Nominal)
Defendant and as a Direct Defendant;)
MARY PAT ROONEY, President of the)
Fraternity Council of KAPPA KAPPA GAMMA)
FRATERNITY, in her official capacity, KAPPA)
KAPPA GAMMA BUILDING CO., a Wyoming)
non-profit corporation, and ARTEMIS)
LANGFORD,)
)
)
Defendants.)

**ARTEMIS LANGFORD’S
MOTION TO DISMISS WITH PREJUDICE**

COMES NOW, Defendant Artemis Langford, by and through her undersigned attorney, Rachel Berkness of Freeburg Law, LLC, and hereby moves this Court for an Order dismissing Plaintiffs’ Amended Complaint with prejudice for failure to state a claim

under Federal Rule of Civil Procedure 12(b)(6), lack of standing, and violation of Federal Rule of Civil Procedure 8.

Dated 06/20/2023.

/s/ Rachel Berkness
Rachel M. Berkness, Bar No. 7-5966
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 20th day of June 2023.

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/s/ Rachel Berkness
Rachel Berkness