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CC: William H. Davidson llwdavidson@DML-LAW.com

Date: 7/28/2016 11:03:08 AM

Subject: Draft motion for summary judgment in Bilbro case

Attachments: MFSJ (second) (00868994xBE0C9).docx

Mem supp MFSJ (second) (00868996xBE0C9).docx

Exhibit 1 to MSJ- Aff of Dorothy Addison (05-05-16) #30-2 (00845021xBE0C9).pdf

Exhibit 2 to MSJ-Letter Haley to Kerry (05-05-16) #30-3 (00845023xBE0C9).pdf

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Attached is a draft motion for summary judgment in the Bilbro case, along with the draft memo in support and the exhibits.

Pages 1 through 11 are substantially similar to the previous motion for summary judgment filed in May, when the only defendants were the Governor and DSS officials.

The remainder, pp. 11-17, goes through the Amended Complaint to show why it does not state a claim. The only specific mention of the newly-added agencies is on p. 12, where I note that “, the Amended Complaint contains virtually no specific allegations against any of those agency heads, and certainly nothing which actually alleges legal wrongdoing on the part of any of them.”

Please review and let me know if you see a need for additions or changes. I plan to file this tomorrow or Monday, and then follow up with a short memorandum opposing preliminary injunctive for the reasons stated in the attached summary judgment memo.

Ken