



Carolina. This Court lacks personal and/or subject matter jurisdiction to adjudicate this cause of action and Plaintiffs' have failed to state a claim upon which relief can be granted due to Plaintiffs' failure to exhaust administrative remedies. In support of this motion, State Defendants rely on the factual grounds, arguments and legal authorities set forth in the accompanying brief.

Respectfully submitted, this the 3rd day of November, 2023.

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