

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

BRIDGET SULLIVAN,

Plaintiff,

v.

PATRICK HARRIGAN,

Defendant.

Civil Action No. 1:25-CV-1016

**UNITED STATES' MOTION TO DISMISS**

NOW COMES the United States of America, by and through Clifton T. Barrett, United States Attorney for the Middle District of North Carolina, pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure and respectfully moves this Court to dismiss this action.

The United States seeks dismissal on grounds that the Court lacks jurisdiction over Plaintiff's complaint because she has failed to exhaust her administrative remedies under the Federal Tort Claims Act, and because her claims are barred by that Act.

In support of its motion, the United States submits the accompanying Memorandum of law.

WHEREFORE, the United States respectfully prays that the Court grant this motion to dismiss for lack of subject matter jurisdiction, and for such other and further relief as the Court may deem just and proper.

This the 6th day of November, 2025.

Respectfully submitted,

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United States Attorney

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**Certificate of Service**

I hereby certify that on November 6, 2025, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, and that a copy or copies of the document(s) was or were served via the CM/ECF system (or by other means, if specified below) on the following:

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/s/ Lynne P. Klauer  
LYNNE P. KLAUER  
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