

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

SHAUNA WILLIAMS; *et al.*,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House Standing
Committee on Redistricting; *et al.*,

Defendants.

Civil Action No. 23-CV-1057

NORTH CAROLINA STATE CONFERENCE
OF THE NAACP; *et al.*,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the
President Pro Tempore of the North Carolina
Senate; *et al.*,

Defendants.

Civil Action No. 23-CV-1104

LEGISLATIVE DEFENDANTS' MOTION TO DISMISS

Legislative Defendants, by and through undersigned counsel, file this motion to dismiss Counts 10 through 12 of the NAACP Supplemental Complaint, [D.E. 180 ¶¶ 78–121], and Counts III and IV of the Williams Supplemental Complaint, [D.E. 181 ¶¶ 159–76] pursuant to Federal Rule of Civil Procedure 12(b)(1) and, in the alternative, Rule 12(b)(6).

In support of this motion, Legislative Defendants contemporaneously file a supporting memorandum of law and incorporate by reference the facts and arguments stated therein. Additionally, in support of this motion, Legislative Defendants submit and incorporate by reference the following exhibits:

- Exhibit A: *League of United Latin Am. Citizens v. Abbott*, No. 21-CV-00259, Dkt. 1226, Mem. Op. & Order (W.D. Tex. Sept. 30, 2025)

WHEREFORE, Legislative Defendants respectfully request that the Court grant this motion to dismiss and dismiss Counts 10 through 12 of the NAACP Supplemental Complaint and Counts III and IV of the Williams Supplemental Complaint.

Respectfully submitted, this the 4th day of November, 2025.

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**Appeared via Special Notice*

CERTIFICATE OF SERVICE

I, Phillip J. Strach, hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will provide electronic notification to counsel of record.

This the 4th day of November, 2025.

**NELSON MULLINS RILEY &
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/s/ Phillip J. Strach _____
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