

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

NATIONAL FEDERATION OF THE BLIND, *et al.*,

Plaintiffs,

v.

CASE NO. 3:23cv127

VIRGINIA DEPARTMENT OF CORRECTIONS, *et al.*,

Defendants.

MOTION TO DISMISS

Defendants Barry Marano, Darrell Miller, Harold Clarke, Kevin Punturi, Lakeisha Shaw, Lane Talbott, Larry Edmonds, Officer D. Smith, Tammy Williams, and the Virginia Department of Corrections (“VDOC”), by counsel, submit this Motion to Dismiss pursuant to Rule 12(b)(1) and Rule 12(b)(6) of the Federal Rules of Civil Procedure. For the reasons set forth more fully in the accompanying Memorandum, these Defendants respectfully request that all claims asserted against them in the Plaintiffs’ Complaint be dismissed.

Respectfully submitted,

BARRY MARANO, DARRELL MILLER,
HAROLD CLARKE, KEVIN PUNTURI,
LAKEISHA SHAW, LANE TALBOTT, LARRY
EDMONDS, OFFICER D. SMITH, TAMMY
WILLIAMS, AND THE VIRGINIA
DEPARTMENT OF CORRECTIONS

By: /s/Laura Maughan
Laura Maughan, VSB #87798
Assistant Attorney General
Office of the Attorney General

