

**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**

Chadwick Dotson, 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)(6) of the Federal Rules of Civil Procedure. For the reasons set forth more fully in the accompanying Memorandum, Defendants Dotson, Marano, Miller, Clarke, Punturi, Lakeisha Shaw, Talbott, Edmonds, Smith, and Tammy Williams respectfully request that the Court dismiss them from this action. Further, Defendants Barry Marano, Darrell Miller, Harold Clarke, Kevin Punturi, Lakeisha Shaw, Lane Talbott, Larry Edmonds, Officer D. Smith, Tammy Williams, along with VDOC, also respectfully request that the Court dismiss the Plaintiffs’ Virginians with Disabilities Act claims against them.

Respectfully submitted,

CHADWICK DOTSON, 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.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of November, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (“NEF”) to the following:

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