

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**JACKIE WILLIAMS SIMPSON, *et al.*,**

**PLAINTIFFS,**

**v.**

**Case No. 4:22-cv-00213-JM (three-judge court)**

**JOHN THURSTON, in his official  
capacity as the Arkansas Secretary of  
State,**

**DEFENDANT.**

**DEFENDANT’S MOTION TO DISMISS**

Pursuant to Rule 12(b)(6), and for the reasons stated in Defendant’s brief in support of Defendants’ motion to dismiss, Defendant respectfully requests that this Court dismiss Plaintiffs’ First Amended Complaint with prejudice.

Dated: December 16, 2022

Respectfully submitted,

LESLIE RUTLEDGE  
Arkansas Attorney General  
NICHOLAS J. BRONNI (2016097)  
Solicitor General  
DYLAN L. JACOBS (2016167)  
Deputy Solicitor General  
OFFICE OF THE ARKANSAS  
ATTORNEY GENERAL  
323 Center Street, Suite 200  
Little Rock, Arkansas 72201  
(501) 682-2007  
(501) 682-2591 (fax)  
Dylan.Jacobs@arkansasag.gov

*Counsel for Defendant*