

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

JACKIE WILLIAMS SIMPSON *ET AL*

PLAINTIFFS

V.

No. 4:22-CV-213-JM-DRS-DPM

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

DEFENDANT

**PLAINTIFFS' RESPONSE TO
DEFENDANT'S MOTION TO DISMISS
FILED DECEMBER 16, 2022**

Come the Plaintiffs, and for their Response to the Defendant, John Thurston's, Motion to Dismiss, state that they deny that the Defendant is entitled to a dismissal of the Complaint for the reasons contained in the Brief In Support of Plaintiffs' Response to Motion to Dismiss filed contemporaneously herewith.

Respectfully submitted,

Richard H. Mays
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CERTIFICATE OF SERVICE

The undersigned certifies that on the date of filing of this Response to Motion to Dismiss, a copy of the same was served upon counsel of record for the Defendant by and through the Court's electronic filing and service system, and by electronic mail addressed to:

Dylan L. Jacobs, Esq.
Deputy Solicitor General
Office of the Arkansas Attorney General
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Dated: December 26, 2022.

/s/ Richard H. Mays
Richard H. Mays