

STATE OF MINNESOTA**DISTRICT COURT****Employment****COUNTY OF BECKER****SEVENTH JUDICIAL DISTRICT**Margaret Campbell,
Plaintiff,

Court File No. 03-CV-19-266

vs.

**DEFENDANT'S MOTION TO
DISMISS COUNT 1
FOR LACK OF SUBJECT
MATTER JURISDICTION**Honor the Earth,
Defendant.

TO: Christy L. Hall of Gender Justice, 200 University Ave. W, Suite 200 St.
Paul, Minnesota 55103, and
Becker County Court Administrator.

COMES NOW Defendant Honor the Earth, by and through its attorney Frank Bibeau, pursuant to Minn. R. Civ. Pro. 12.08(c) for lack of subject matter jurisdiction, Rule 12.02(e) failure to state a claim upon which relief can be granted, and Minn. Stat. 363A *et seq* exceeding the statute of limitation to bring an action under Minn. Stat. 363A for discrimination alleged for Count 1 in Plaintiff's Complaint, hereby motions the court for dismissal of Count 1 for lack of subject matter jurisdiction.

Dated: February 1, 2021

/s/ Frank Bibeau

Frank Bibeau (Mn# 306460)

Attorney for Defendant Honor the Earth