

STATE OF SOUTH CAROLINA)	
)	IN THE COURT OF COMMON PLEAS
COUNTY OF ORANGEBURG)	FIRST JUDICIAL CIRCUIT
Dr. Thomasena Adams <i>et al.</i> ,)	Case No. 2020-CP-38-00774
)	
Plaintiffs,)	PPI’S MOTION TO DISMISS
)	AMENDED COMPLAINT
vs.)	
)	
Governor Henry McMaster <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

Defendant Palmetto Promise Institute (“PPI”) files this motion only out of an abundance of caution regarding the uncertain status of the amended complaint as it relates to this dispute before the circuit court. By making this filing, PPI does not intend to disrupt or delay the proceedings before the South Carolina Supreme Court or otherwise signal any objection to the Supreme Court resolving this dispute in its original jurisdiction.

To the extent the above-captioned matter is not stayed in its entirety while the Plaintiffs’ petition for original jurisdiction is pending before the Supreme Court, and to the extent this Court treats the amended complaint that was circulated via email on August 3rd to be the operative pleading pending before this Court, PPI moves to dismiss the amended complaint pursuant to Rule 12(b), SCRCF. In support of this motion, PPI incorporates by reference its prior motion to dismiss, as well as all arguments that PPI presented to this Court and in PPI’s filings with the Supreme Court regarding the Plaintiffs’ claims. PPI also incorporates by reference all dispositive arguments presented by any of its co-defendants to the extent such arguments are not inconsistent with the positions presented by PPI.

Respectfully submitted,

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