

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**DO NO HARM**

**PLAINTIFF**

**V.**

**CIVIL ACTION NO. 3:24-CV-11-CWR-LGI**

**NATIONAL ASSOCIATION OF  
EMERGENCY MEDICAL TECHNICIANS**

**DEFENDANT**

**MOTION TO DISMISS PLAINTIFF’S AMENDED COMPLAINT**

COMES NOW Defendant National Association of Emergency Medical Technicians (“NAEMT”), through counsel, and moves the Court to dismiss Plaintiff’s Amended Complaint [Doc. 20] for lack of Article III standing under Federal Rule of Civil Procedure 12(b)(1), or in the alternative, for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6).

In support, NAEMT relies on the contemporaneously filed Memorandum in Support of its Motion.

**WHEREFORE PREMISES CONSIDERED**, NAEMT requests the Court grant its Motion and dismiss all of Plaintiff’s claims of relief and its Amended Complaint with prejudice. NAEMT requests all other and further relief to which it may be entitled to under the circumstances.

Respectfully submitted, this the 18<sup>th</sup> day of March, 2024.

**NATIONAL ASSOCIATION OF  
EMERGENCY MEDICAL TECHNICIANS**

By: /s/ Mary Clark Joyner  
R. Jarrad Garner (MSB #99584)  
Mary Clark Joyner (MSB #105954)  
ADAMS AND REESE LLP  
1018 Highland Colony Parkway, Suite 800  
Ridgeland, Mississippi 39157  
(p) 601-353-3234  
[jarrad.garner@arlaw.com](mailto:jarrad.garner@arlaw.com)  
[maryclark.joyner@arlaw.com](mailto:maryclark.joyner@arlaw.com)

**CERTIFICATE OF SERVICE**

I do hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

THIS the 18th day of March, 2024.

/s/ Mary Clark Joyner