

STATE OF VERMONT

SUPERIOR COURT  
Lamoille Unit

CIVIL DIVISION  
Docket No. 100-5-17 Lecv

ANTONY SUTTON, WEI WANG, )  
XIAOFENG FENG, GUANGYI XIONG )  
and ROBERT CONNORS, )  
individually, and on behalf of a )  
class of similarly situated persons, )  
Plaintiffs, )

v. )

THE VERMONT REGIONAL CENTER, )  
STATE OF VERMONT AGENCY OF )  
COMMERCE AND COMMUNITY )  
DEVELOPMENT, STATE OF VERMONT )  
DEPARTMENT OF FINANCIAL )  
REGULATION, JAMES CANDIDO, )  
WILLIAM CARRIGAN, SUSAN DONEGAN, )  
EUGENE FULLAM, JOAN GOLDSTEIN, )  
JOHN W. KESSLER, LAWRENCE MILLER, )  
PATRICIA MOULTON, MICHAEL PIECIAK, )  
and BRENT RAYMOND, )  
Defendants. )

DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' THIRD AMENDED COMPLAINT

Defendants – ten individual current and former state employees, the Department of Financial Regulation, the Agency of Commerce and Community Development, and the Vermont Regional Center – by and through their counsel, the Vermont Attorney General’s Office, hereby move to dismiss Plaintiffs’ Third Amended Complaint in its entirety, pursuant to Rules 12(b)(1) and 12(b)(6) of the Vermont Rules of Civil Procedure. In support of their motion, Defendants submit the accompanying Memorandum of Law.

Office of the  
ATTORNEY  
GENERAL  
109 State Street  
Montpelier, VT  
05609

DATED at Montpelier, Vermont this 9th day of October 2017.

STATE OF VERMONT

THOMAS J. DONOVAN, JR.  
ATTORNEY GENERAL

By:



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Counsel for Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of October 2017, I served Defendants' Motion to Dismiss Plaintiffs' Third Amended Complaint and accompanying Memorandum of Law in Support of Motion to Dismiss Plaintiffs' Third Amended Complaint in the above-captioned matter by sending same via first class mail, postage prepaid, to the following:

Russell D. Barr, Esq.  
Chandler W. Matson  
Benjamin E. Novogroski  
Barr Law Group  
125 Mountain Road  
Stowe, VT 05672

DATED at Montpelier, Vermont this 9th day of October 2017.

STATE OF VERMONT

THOMAS J. DONOVAN, JR.  
ATTORNEY GENERAL

By:



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