IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS, INC. 501 Front Street Norfolk, VA 23510

Plaintiff,

V.

Civil Action No. 1:21-cv-02083-JKB

SHORE TRANSIT
31901 Tri-County Way, Suite 133
Salisbury, MD 21804

BRAD BELLACICCO, in his official capacity as the Director of Shore Transit 31901 Tri-County Way, Suite 133 Salisbury, MD 21804

TRI-COUNTY COUNCIL OF THE LOWER EASTERN SHORE OF MARYLAND
31901 Tri-County Way, Suite 201, Salisbury, MD 21804

Defendants.

PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

Plaintiff People for the Ethical Treatment of Animals, Inc., pursuant to Federal Rule 12(b)(6), opposes Defendantøs Motion to Dismiss for the reasons set forth in the attached Combined Memorandum of Law in Support of Plaintifføs Motion for Preliminary Injunction and in Opposition to Defendantsø Motion to Dismiss.

WHEREFORE, Plaintiff respectfully requests this Court deny Defendant Motion to Dismiss and grant it such other and further relief as the nature of its cause may warrant.

Dated: October 8, 2021

Respectfully submitted,

/s/

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* Pro hac vice

__/s/

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of October, 2021, I electronically filed the foregoing Plaintiff's Opposition to Defendants' Motion to Dismiss with the clerk of the Court by using the CM/ECF system, and via the Court's CM/ECF system on all counsel of record.

/s/___

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Counsel for Plaintiff