

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DR. SHIVA AYYADURAI,)	
)	
Plaintiff,)	
)	Hearing Requested
v.)	
)	
WILLIAMS FRANCIS GALVIN, MICHELLE)	Civ. No. 20-cv-11889
K. TASSINARI, DEBRA O'MALLEY, AMY)	
COHEN, NATIONAL ASSOCIATION OF)	
STATE ELECTION DIRECTIOS, allegedly in)	
their individual capacities, and WILLIAM)	
FRANCIS GALVIN, in his official capacity as)	
Secretary of State for Massachusetts.)	
)	
Defendants.)	
)	
)	
)	

**MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION
BY INDIVIDUAL DEFENDANT AMY COHEN**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Individual Defendant Amy Cohen moves the Court to Dismiss all claims against her for lack of personal jurisdiction. This motion is supported by the accompanying Memorandum of Law and the Affidavit of Amy Cohen, submitted herewith. For the reasons set forth therein, Ms. Cohen respectfully requests that the Court enter an order dismissing all claims against her, and order such other relief as the Court deems appropriate.

Dated: January 7, 2021

Respectfully submitted,

/s/ Nolan J. Mitchell
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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

The undersigned hereby certifies that he conferred with Plaintiff in an effort to resolve or narrow the issues in this motion, but the parties were unable to do so.

/s/Nolan J. Mitchell
Nolan J. Mitchell

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 7th day of January, 2021, a true and correct copy of this document was served on plaintiff and all registered counsel of record via the Court's ECF system.

/s/Nolan J. Mitchell
Nolan J. Mitchell