

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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JEFFREY BARHAM, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civ. Action No. 02-2283 (EGS)
	:	
CHARLES H. RAMSEY, <i>et al.</i> ,	:	
	:	
Defendants.	:	

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**MOTION OF DEFENDANTS CHIEF CHARLES H. RAMSEY  
AND MAYOR ANTHONY A. WILLIAMS TO DISMISS THE COMPLAINT  
OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT**

Pursuant to Rules 12(b)(6) and 56(e) of the Federal Rules of Civil Procedure, defendants Charles H. Ramsey, Chief of the Metropolitan Police Department (“MPD”), and Mayor Anthony A. Williams, respectfully move this Court to enter an order dismissing the Complaint based upon its failure to state a claim against them upon which relief can be granted or, in the alternative, granting them summary judgment. The defendants move for the relief requested upon the grounds that they are entitled to judgment as a matter of law, as set forth in greater detail in the accompanying memorandum of points and authorities filed contemporaneously with and incorporated by reference into this motion.

Respectfully submitted,  
  
ROBERT J. SPAGNOLETTI  
Corporation Counsel

/s/ Robert C. Utiger  
ROBERT C. UTIGER [437130]  
Deputy Corporation Counsel  
Equity and Receivership Division

/s/ Thomas L. Koger  
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Attorneys for Defendants Charles H.  
Ramsey and Anthony A. Williams

**Certificate of Service**

I hereby certify that on the 15th day of October 2003, I caused a true copy of the foregoing MOTION OF DEFENDANTS CHIEF CHARLES H. RAMSEY AND MAYOR ANTHONY A. WILLIAMS TO DISMISS THE COMPLAINT OR, IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT to be filed electronically with the Court for electronic service upon:

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