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Jason E. Bragg, Clerk
Effingham County, Georgia

IN THE STATE COURT OF EFFINGHAM COUNTY
STATE OF GEORGIA

SHANE RAMSEY,

Plaintiff,

v.

YANCY FORD and JAMIE WELLS,

Defendants.

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Civil Action No: **STCV2023000435**

DEFENDANT JAMIE WELLS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

COMES NOW, JAMIE WELLS, a Defendant in the above-referenced action, and having specially appeared so as not to submit himself to the jurisdiction of this Court, and pursuant to O.C.G.A. §§ 9-2-5 and 9-11-12(b), moves to dismiss the above-styled action as the prior pending action of *Shane Ramsey v. Effingham Board Member, F. Lamar Allen, Officially, Board Member, Vickie Decker, Officially, Board Member, Jan Landing, Officially, Board Member, Lynn Anderson, Officially, Board Member, Ben Johnson, Officially, Officially Dr. Yancy Ford, Officially, Amie Dickerson, Officially, Jamie Wells*, In the Superior Court of Effingham County, State of Georgia, Civil Action No.: SUCV2023000096 involves the same relevant Plaintiff and Defendant for the same alleged conduct by Defendant Wells. Furthermore, to the extent the instant action is not barred due to the prior pending litigation, Plaintiff failed to include necessary parties to the litigation. In support of this motion, Defendant Wells relies upon the argument and authority cited in the accompanying Brief in Support of Defendant's Motion to Dismiss.

As this motion to dismiss is being filed before or at the time of filing an answer, discovery is stayed ninety (90) days or until the ruling of the Court on this motion, whichever is sooner. O.C.G.A. § 9-11-12(j)(1).

WHEREFORE, Defendant **JAMIE WELLS** respectfully requests that his Motion to Dismiss be GRANTED.

This 2nd day of January, 2024.

RAHIMI, HUGHES & PADGETT, LLC

/s/J. WESLEY PADGETT

J. WESLEY PADGETT

Georgia Bar No. 165007

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CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing **DEFENDANT JAMIE WELLS'** **MOTION TO DISMISS PLAINTIFF'S COMPLAINT** has been served on counsel for all parties by placing same in the United States Mail in a properly addressed envelope with sufficient postage affixed thereon and/or via electronic mail to all other counsel of record to ensure delivery to:

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