

**DEAFUEH MONBO et. al.**  
*Plaintiffs,*

IN THE CIRCUIT COURT

FOR BALTIMORE

v.

COUNTY MARYLAND

**ELIZABETH LEAMING, et al.,**  
*Defendants*

Case No.: C-03-CV-22-003607

**MOTION TO DISMISS FOR LACK OF JURISDICTION**  
**BY DEFENDANTS LEAMING AND STABLE**

Pursuant to Rules 2-322(a)(1) and 2-322(b)(1) of the Maryland Rules of Procedure for the Circuit Courts, Defendants Leaming and Stable (*hereinafter*, the “Connecticut Defendants”) move to dismiss the above captioned matter for lack of personal and subject matter jurisdiction. Contrary to the Plaintiffs’ assertions in their complaint, Maryland’s long arm statute does not afford this Court jurisdiction over the Connecticut Defendants and this court, therefore lacks jurisdiction over them in their individual capacities. This Court also lacks jurisdiction over the Connecticut Defendants in their official capacities because they are shielded from suit by sovereign immunity. Finally, both as state prosecutors (at the time of the alleged improprieties), are shielded by absolute prosecutorial immunity.

**WHEREFORE**, based upon the aforementioned reasons, as articulated more fully in the Defendants’ accompanying memorandum of law, the Defendants move this Court to dismiss the Complaint as against them with prejudice.

Respectfully submitted,

**DEFENDANTS**  
**Leaming, Stable**

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