

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM FRENCH, ET. AL.

No. 3:23-cv-538-MEM

Plaintiffs

v.

LUZERNE COUNTY, ET. AL.

Defendants

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Under Federal Rule of Civil Procedure 56, plaintiffs, William French and Melynda Anne Reese, respectfully move for summary judgment in their favor and against defendants. There are no genuine issues of material fact and plaintiffs are entitled to judgment as a matter of law. Fed. R. Civ. P. 56(a). Plaintiffs' pending brief presents their arguments in support of their motion for summary judgment. This motion is also accompanied by a statement of undisputed material facts and accompanying exhibits as required by the Court's policies and procedures.

A proposed form of order is attached to this motion.

Respectfully submitted,

Dated: April 15, 2024

/s/ Walter S. Zimolong

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Certificate of Service

I hereby certify the foregoing has been filed electronically and is available for viewing and downloading from the Electronic Case Filing System of the United States District Court for the Middle District of Pennsylvania. I further hereby certify that, in accordance with Fed. R. Civ. P. 5, service has been made upon counsel of record via ECF.

Respectfully submitted,

Dated: April 15, 2024

/s/ Walter S. Zimolong III
WALTER S. ZIMOLONG III, ESQ.