

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division**

**ALYSSA REID,**

**Plaintiff,**

**v.**

**Case No. 5:21-cv-00032**

**JAMES MADISON UNIVERSITY, et. al.**

**Defendants.**

**DEFENDANTS JAMES MADISON UNIVERSITY,  
JONATHAN R. ALGER, HEATHER COLTMAN,  
ROBERT AGUIRRE, AND AMY M. SIROCKY-MECK'S  
MOTION TO DISMISS PURSUANT TO RULES 12(b)(1) and 12(b)(6)**

Pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, defendants, James Madison University, JMU President Jonathan R. Alger, Provost Heather Coltman, Dean Robert Aguirre, and Title IX Coordinator, Amy M. Sirocky-Meck (collectively “JMU Defendants”), through undersigned counsel, respectfully move this Court to dismiss the plaintiff’s Complaint with prejudice. In support, the JMU Defendants rely on the Memorandum in Support filed herewith.

**Respectfully submitted,**

*/s/ Amy E. Hensley*

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> of June, 2021, I filed a copy of the foregoing document using the Court's ECM/ECF filing system, which will send an electronic notification of the same (NEF) to counsel of record for the plaintiff.

/s/ Amy E. Hensley  
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