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| **Motion to Dismiss for Lack of Standing** | Ian Freeman  63 Emerald St. #610  Keene, New Hampshire |

**March 04, 2013**

Court Name: Keene District

Case Name: State v. Ian Freeman f/k/a Ian Bernard

Case Number: **449-2013-CR-00206**

Now comes Ian Freeman (formerly known as Ian Bernard) of the Shire Society, called defendant by this court, by special appearance, not submitting to the court’s jurisdiction, who hereby moves the court to to enter an order to do the following:

The court should dismiss this case due to lack of standing and in support thereof, defendant states the following:

1. Plaintiff admits in point 5 of their “OBJECTION TO MOTION TO DISMISS” filed on 2013-02-15 that they are merely “requesting” that defendant “comply with a fire department regulation”.
2. Defendant appreciates that plaintiff is acknowledging the voluntary nature of the fire department regulation by it clarifying the whole matter is a request. Until this point, it has felt very coercive.
3. The plaintiff has wasted the court’s time with a matter that is not subject to litigation, since as a request there is clearly no obligation to obey.
4. If there is no obligation to obey the city’s regulation, there is no “violation”, and no standing.
5. Without standing, there is no case before the court.

**Conclusion and request for relief:**

The court should dismiss this case for lack of standing and with prejudice. Plaintiff has admitted they do not have standing and therefore have no case.

In addition to the above, the court should grant such other and further relief as the court may deem reasonable and just under the circumstances.

Delivered this \_\_\_\_ day of **March 2013.**

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Certificate of service

This is to certify that a true and correct copy of the foregoing has been delivered this

\_\_\_ day of **March 2013** to the alleged plaintiff.

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