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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

COLE ROBINSON, a/k/a KATIE
ROBINSON; IZAIHA SINGER, and JANE
DOE,

Plaintiffs,

v.

RAUL LABRADOR, in his official capacity
as Attorney General of the State of Idaho;
BRAD LITTLE, in his official capacity as
Governor of the State of Idaho; JOSH
TEWALT, in his official capacity as the
Director of the Idaho Department of
Corrections; BREE DERRICK, in her official
capacity as the Deputy Director of IDOC;
CENTURION OF IDAHO, LLC;
CENTURION LLC,
Defendants.

Case No. 1:24-cv-00306-DCN

**CENTURION, LLC'S MOTION TO
DISMISS PLAINTIFFS' AMENDED
CLASS ACTION COMPLAINT FOR
DECLARATORY AND INJUNCTIVE
RELIEF [DKT. 209]**

Centurion, LLC respectfully moves this Court, pursuant to Federal Rules of Civil Procedure

12(b)(2) and 12(b)(6) for an order dismiss Plaintiffs' Amended Class Action Complaint For

**CENTURION, LLC'S MOTION TO DISMISS PLAINTIFFS' AMENDED CLASS ACTION COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF [DKT. 209] - 1**

Declaratory And Injunctive Relief [Dkt. 209] (“Second Amended Complaint”) in its entirety as to defendant Centurion, LLC on the grounds Centurion, LLC is not subject to either general or specific personal jurisdiction in Idaho and Plaintiffs have failed to state a claim against it because a bare parent-subsiary relationship is insufficient to support a right to relief for constitutional violations under Section 1983.

Centurion, LLC’s Motion to Dismiss is supported by the accompanying *Memorandum in Support of Centurion, LLC’s Motion to Dismiss Plaintiffs’ Amended Class Action Complaint For Declaratory And Injunctive Relief [Dkt. 209]*, and the Declaration of Counsel, both filed herewith.

DATED this 29th day of July 2026.

DUKE EVETT, PLLC,

By: /s/ Christina M. Hesse
Christina M. Hesse – Of the Firm
*Attorney for Defendants Centurion of Idaho,
LLC and Centurion, LLC*

BRADLEY ARANT BOULT CUMMINGS LLP,

By: /s/ Michael J. Bentley
Michael J. Bentley (*pro hac vice*)
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LLC and Centurion, LLC*

CERTIFICATE OF SERVICE

I certify that on this 29th day of July 2026, I electronically filed the foregoing document with the U.S. District Court. Notice will automatically be electronically mailed to the following individuals who are registered with the U.S. District Court CM/ECF System:

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