

STATE OF INDIANA)	IN THE MARION SUPERIOR COURT
) SS:	
COUNTY OF MARION)	CAUSE NO. 49D01-1907-PL-27728
)	
JOSHUA PAYNE-ELLIOTT)	
)	
Plaintiff,)	
)	
)	
v.)	
)	
ROMAN CATHOLIC ARCHDIOCESE OF)	
INDIANAPOLIS, INC.)	
)	
Defendant.)	

**DEFENDANT ROMAN CATHOLIC ARCHDIOCESE OF INDIANAPOLIS, INC.’S
MOTION TO DISMISS COMPLAINT**

Pursuant to Rule 12(B)(1) and 12(B)(6) of the Indiana Rules of Trial Procedure, Defendant, Roman Catholic Archdiocese of Indianapolis, Inc. (“Archdiocese”), respectfully moves the Court to enter an Order dismissing Plaintiff Joshua Payne-Elliott’s claims against the Archdiocese for lack of subject matter jurisdiction and failure to state a claim. The grounds for this Motion are stated more fully in the accompanying Memorandum of Law, which is incorporated herein by reference.

Respectfully submitted,
MERCER BELANGER, P.C.

/s/ John S. (Jay) Mercer
John S. (Jay) Mercer, Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following by this court's electronic filing system this ____ day of _____ 2019:

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