

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF KALAMAZOO

SABRINA PRITCHETT-EVANS and  
KIMBERLY HARRIS

Plaintiffs

Case No. 2023-0169-CZ

v.

HON. CURTIS J. BELL

REPUBLICAN PARTY OF KALAMAZOO  
COUNTY, STATE OF MICHIGAN (KGOP);  
KALAMAZOO GRAND OLD PARTY  
EXECUTIVE COMMITTEE (KGOPEC); and  
KELLY SACKETT

Defendants.

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Matthew S. DePerno (P52622)  
DEPERNO LAW OFFICE, PLLC  
Attorney for Defendant Sackett  
Attorney for Defendants KGOP and KGOPEC  
*per limited appearance*  
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**DEFENDANTS' MOTION FOR SUMMARY DISPOSITION PURSUANT TO MCR  
2.116(C)(1), (C)(2), (C)(3), (C)(4), (C)(5), (C)(7), (C)(8), and (C)(10)**

**And**

**DEMAND FOR SANCTIONS PURSUANT TO MCR 1.109(E)**

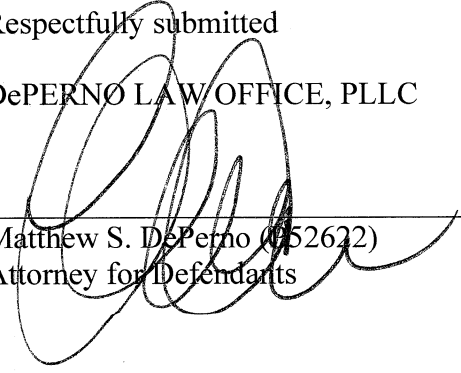
Defendants REPUBLICAN PARTY OF KALAMAZOO COUNTY, STATE OF MICHIGAN ("KGOP"); KALAMAZOO GRAND OLD PARTY EXECUTIVE COMMITTEE ("KGOPEC"); and KELLY SACKETT ("Sackett"), by and through their attorney, DePERNO LAW OFFICE, PLLC, brings this motion for summary disposition pursuant MCR 2.116(C)(1), (C)(2), (C)(3), (C)(4), (C)(5), (C)(7), (C)(8), and (C)(10) and also demands sanctions pursuant to MCR 1.109(E) for the reasons set forth below and in the accompanying brief.

1. Pursuant to MCR 2.116(C)(1), (C)(3), and (C)(4) the court lacks jurisdiction over the parties and lacks subject matter jurisdiction.
2. Pursuant to MCR 2.116(C)(2) service of process was insufficient.
3. Pursuant to MCR 2.116(C)(5) the Plaintiffs lack the capacity to sue.
4. Pursuant to MCR 2.116(C)(7) Defendants have immunity.
5. Pursuant to MCR 2.116(C)(8) Plaintiffs have failed to state a claim on which relief can be granted.
6. Pursuant to MCR 2.116(C)(10) there is no genuine issue of fact and Defendants are entitled to judgment as a matter of law.
7. Defendants also demand sanctions pursuant to MCR 1.109(E) because Plaintiffs and their attorney intentionally and improperly served the complaint with an improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.
8. In support of this motion, Defendants rely on the attached brief.

WHEREFORE, Defendants respectfully requests this Honorable Court dismiss Plaintiffs' complaint with prejudice and award Defendants their costs and attorneys' fees and grant such other relief the Court deems just and appropriate.

Respectfully submitted

DePERNO LAW OFFICE, PLLC



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Matthew S. DePerno (52622)  
Attorney for Defendants

Dated: April 28, 2023