

**IN THE  
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

KEVIN SOPER,

*Plaintiffs,*

v.

WILLIE FARRAR, ET AL.,

*Defendants.*

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No. 1:26-cv-00069-JRR

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**MOTION TO DISMISS AMENDED COMPLAINT**

Defendants, Charlene Notarcola, and Robert Sentman, by their undersigned counsel, file this motion to dismiss, pursuant to Federal Rule of Civil Procedure 12(b)(6), and moves this Court to dismiss the Plaintiff's Amended Complaint and all claims against him with prejudice. (ECF No. 21.) The grounds for this motion are set out in the accompanying memorandum in support.

Respectfully submitted,

ANTHONY G. BROWN  
Attorney General of Maryland

/s/ Wendy L. Shiff

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June 10, 2026

*Attorneys for Defendants  
Charlene Notarcola and Robert Sentman*

### **CERTIFICATE OF SERVICE**

I certify that, on this 10th day of June, 2026 the foregoing was served by CM/ECF on all registered CMF users and by first-class mail on the following:

Kevin A. Soper  
704 Cedarday Drive  
Bel Air, Maryland 21015

/s/ Wendy L. Shiff

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Wendy L. Shiff

