

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

JANE DOE, *et al.* :
Plaintiffs :
 :
vs. : Civil No. 361586-V
 : Track 4
SOVEREIGN GRACE MINISTRIES, *et al.* : Judge Sharon Burrell
Defendants :

**MOTION TO DISMISS DEFENDANTS COVENANT LIFE CHURCH, INC.,
CHARLES JOSEPH MAHANEY, GARY RICUCCI, JOHN LOFTNESS, AND
GRANT LAYMAN**

Come now the Defendants, Covenant Life Church, Inc., Charles Joseph Mahaney, Gary Ricucci, John Loftness, and Grant Layman, by and through their attorneys, Thomas Patrick Ryan and McCarthy Wilson, LLP, and pursuant to Maryland Rule 2-322, respectfully request that this Honorable Court DISMISS the Complaint filed against them. In support thereof, these Defendants state as follows:

1. The Plaintiffs have failed to state a claim upon which relief can be granted;
2. The Plaintiffs have failed to comply with basic pleading requirements;
3. The Plaintiffs lack standing to bring this claim and/or their claims are barred by the statute of limitations;
4. Maryland does not recognize a cause of action for clergy malpractice; and
5. The Plaintiffs claims are barred by the First Amendment.

WHEREFORE, for the foregoing reasons, and as is more fully set forth in the accompanying Memorandum of Grounds and Authorities, these Defendants respectfully request that this Honorable Court:

1. GRANT their Motion to Dismiss; and
2. GRANT such other and further relief as this Court deems just and proper.

Respectfully submitted,

McCARTHY WILSON LLP

By: _____
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Layman*

REQUEST FOR HEARING

These Defendants, Covenant Life Church, Inc., Charles Joseph Mahaney, Gary Ricucci, John Loftness, and Grant Layman, respectfully request an oral hearing on all issues raised herein.

Thomas Patrick Ryan

CERTIFICATE OF SERVICE

I HEREBY certify that on this 25th day of February, 2013, a copy of the foregoing **Motion to Dismiss** was mailed first-class, postage prepaid, to:

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