

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SIMON B. AMAYA PRICE,

Plaintiff,

v.

CITY OF NASHUA AND LORI WILSHIRE,
President, Board of Aldermen, City of Nashua, in
her official and individual capacities,

Defendants.

Civil Action No. 1:26-cv-00216-TSM

THE DEFENDANTS, CITY OF NASHUA AND LORI WILSHIRE’S
PARTIAL MOTION TO DISMISS

NOW COME the Defendants, City of Nashua (the “City”) and Lori Wilshire (“Wilshire”) (collectively the “Defendants”), by and through counsel, and hereby submit this Partial Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(1). As stated in greater detail in the accompanying Memorandum of Law, most of the Plaintiff’s Complaint is moot in light of the recent passage of City ordinance O-26-006.

WHEREFORE, the Defendants, City of Nashua and Lori Wilshire, respectfully request that this Honorable Court:

- A) GRANT the Defendants’ Partial Motion to Dismiss and
- B) GRANT any further relief that is deemed just and proper.

Respectfully submitted,
City of Nashua and Lori Wilshire,
Defendants
By their Attorneys,

/s/ Jonathan A. Barnes
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Dated: May 26, 2026

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has this day been forwarded via the Court's electronic filing system to Simon B. Amaya Price via his counsel of record.

/s/ Jonathan A. Barnes
Jonathan A. Barnes