

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED SOVEREIGN :
AMERICANS, INC., DIANE :
HOUSER, RUTH MOTON *and* :
DEAN DREIBELBIS, :

Plaintiffs :

v. :

COMMONWEALTH OF :
PENNSYLVANIA, AL SCHMIDT, :
PENNSYLVANIA BUREAU OF :
ELECTIONS, PENNSYLVANIA :
BUREAU OF ELECTION :
SECURITY AND TECHNOLOGY, :
PENNSYLVANIA DEPARTMENT :
OF STATE, MICHELLE HENRY, :
PENNSYLVANIA OFFICE OF :
ATTORNEY GENERAL, :
MERRICK GARLAND *and* :
UNITED STATES DEPARTMENT :
OF JUSTICE, :

Defendants :

No. 1:24-CV-01003

Magistrate Judge Bloom

Electronically Filed Document

Complaint Filed 06/18/24

DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT

AND NOW, come Defendants the Commonwealth of Pennsylvania, the Pennsylvania Office of Attorney General, and Attorney General Michelle Henry, by and through undersigned counsel, and file this Motion, pursuant to Fed. R. Civ. P. 12(b)(6) to dismiss the Plaintiffs' allegations against them with prejudice. A

brief in support of this motion will be filed within the period provided for under Local Rule 7.5.

WHEREFORE, for the reasons further detailed in Defendants' forthcoming Brief in Support, their Motion should be granted. Defendants have contacted Plaintiffs' Counsel, who does not concur in this Motion.

Respectfully submitted,

MICHELLE A. HENRY
Attorney General

By: *s/ ERICH T. GREINER*

ERICH T. GREINER
Deputy Attorney General
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Date: July 22, 2024

**Counsel for Defendants the
Commonwealth of Pennsylvania, The
Pennsylvania Office of Attorney
General, and Attorney General
Michelle Henry**

CERTIFICATE OF CONCURRENCE

I, Erich T. Greiner, Deputy Attorney General, hereby certify that I have sought concurrence from Plaintiffs' counsel, and he does not concur in this Motion.

s/ ERICH T. GREINER
ERICH T. GREINER
Deputy Attorney General

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CERTIFICATE OF SERVICE

I, Erich T. Greiner, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on July 22, 2024, I caused to be served a true and correct copy of the foregoing document titled *Defendants' Motion to Dismiss Plaintiffs' Complaint* to the following:

VIA ELECTRONIC FILING

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Pennsylvania Department of State, and Al
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s/ ERICH T. GREINER

ERICH T. GREINER
Deputy Attorney General

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