## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISON

PAUL BERRY III,

Plaintiff,

and

JOSEPH PERELES, et al.,

Plaintiff-Intervenors,

v.

JOHN R. ASHCROFT, et al.,

Defendants.

Case No. 4:22-CV-465-JAR

## **NON-OPPOSITION TO DEFENSANTS' MOTION TO DISMISS**

Plaintiff-Intervenors Joseph Pereles, Matthew Bax, Ike Graham, Robert Saunders, and

Rachel Howard respectfully submit their non-opposition to Defendants' Motion to Dismiss All

Complaints as Moot Under Rule 12(b)(1) as filed on May 17, 2022.

Dated: May 26, 2022

Respectfully Submitted,

STINSON LLP

By:/s/ Charles W. Hatfield Charles W. Hatfield, No. 40363 Jeremy A. Root, No. 59451 Alixandra S. Cossette, No. 68114 230 W. McCarty Street Jefferson City, MO 65101 Phone: (573) 636-6263 Facsimile: (573) 636-6231 chuck.hatfield@stinson.com jeremy.root@stinson.com alixandra.cossette@stinson.com Abha Khanna\* ELIAS LAW GROUP LLP 1700 Seventh Avenue, Suite 2100 Seattle, WA 98101 Telephone: (206) 656-0177 Facsimile: (206) 656-0180 akhanna@elias.law

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Counsel for Plaintiff-Intervenors \*Admitted Pro Hac Vice

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by the Court's CM/ECF filing system on the 26<sup>th</sup> day of May, 2022, which will notify all parties of record and I also hereby certify that a copy of the foregoing was also served via U.S. Mail and email on the 26<sup>th</sup> day of

May, 2022, to:

Paul Berry, III Plaintiff, *Pro Se* 11932 Barbara Maryland Heights, MO 63043 <u>PBIIIUSA@gamil.com</u>

/s/ Charles W. Hatfield