

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

Case Type: Other Civil/Misc.

Minnesota Alliance for Retired
Americans Educational Fund,
Teresa Maples, and Khalid Mohamed,

Court File No. 62-CV-24-854
(Hon. Edward Sheu)

Plaintiffs,

vs.

**NOTICE OF MOTION
AND MOTION TO DISMISS**

Steve Simon, in his official capacity as
Minnesota Secretary of State,

Defendant.

TO: Plaintiffs Minnesota Alliance for Retired Americans Educational Fund, Teresa Maples, and Khalid Mohamed, through their attorneys, Sybil L. Dunlop and Amran A. Farah, Greene Espel, PLLP, 222 South Ninth Street, Suite 2200, Minneapolis, MN 55402.

NOTICE OF MOTION

PLEASE TAKE NOTICE that, at 10:30 a.m. on May 23, 2024, or as soon thereafter as he may be heard before the Honorable Edward Sheu, Judge of Ramsey County District Court, Defendant Steve Simon will move the Court to dismiss the plaintiffs' complaint as set forth below. The hearing will be conducted through videoconference. The Court will provide further instructions for accessing the videoconference.

MOTION

Pursuant to Minn. R. Civ. P. 12.02(e), Defendant Steve Simon respectfully moves the Court for an order dismissing the plaintiffs' complaint for failing to state a claim upon which relief may be granted. This motion is based on the pleadings in this case. A supporting memorandum will be filed within the timelines established by Minn. R. Gen. Prac. 115.

Dated: March 5, 2024

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/**Angela Behrens**

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ATTORNEYS FOR DEFENDANT

#5720443-v1

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BRANCH

MINN. STAT. § 549.211 ACKNOWLEDGMENT

The party on whose behalf the attached motion is served acknowledges through its undersigned counsel that sanctions, including reasonable attorney fees and other expenses, may be awarded to the opposite party or parties pursuant to Minn. Stat. § 549.211 (2022).

Dated: March 5, 2024

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

/s/**Angela Behrens**

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