

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

SECOND JUDICIAL DISTRICT

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

Case Type: Civil Other/Misc.
Case No. 62-cv-24-854
Judge Edward Sheu

Plaintiffs,

v.

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

Defendant,

Republican National Committee and
Republican Party of Minnesota.

Intervenor-Defendants.

**INTERVENORS' PROPOSED NOTICE
OF MOTION TO DISMISS AND
MOTION TO DISMISS**

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on May 23, 2024, at 10:30 a.m., or as soon thereafter as they may be heard before the Honorable Edward Sheu, Judge of Ramsey County District Court, Republican Party of Minnesota and Republican National Committee (collectively, "Intervenors" or "Republican Committees"), by and through their undersigned counsel, will move the Court to dismiss 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), Intervenors respectfully move this Court for an order dismissing Plaintiffs' claim for lack of jurisdiction and failure to state a claim upon which relief may be granted. This motion is based on the pleadings in this case. A supporting memorandum is being filed contemporaneously with this proposed motion, consistent with the timelines established by Minn. R. Gen. Prac. 115.

DATED: April 25, 2024

Respectfully submitted,

/s/ Benjamin L. Ellison

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**Admitted pro hac vice*

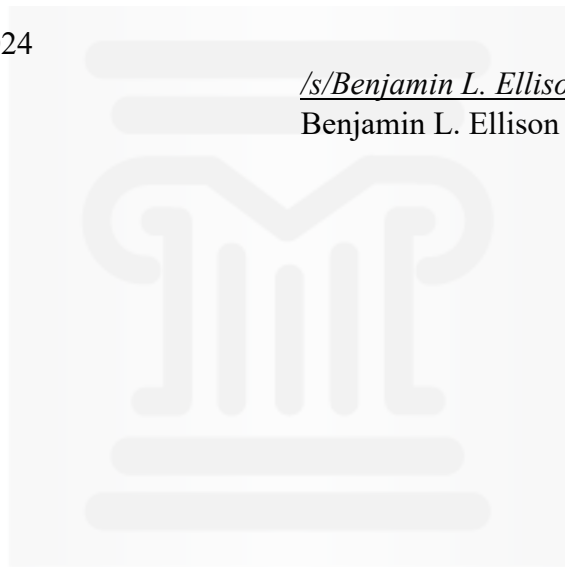
ACKNOWLEDGEMENT

The undersigned acknowledges that sanctions may be imposed pursuant to Minn. Stat. § 549.211.

DATED: April 25, 2024

/s/Benjamin L. Ellison

Benjamin L. Ellison (#392777)



MINNESOTA
JUDICIAL
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