

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUDICIAL WATCH, INC.; ILLINOIS
FAMILY ACTION; BREAKTHROUGH
IDEAS; and CAROL J. DAVIS,

Plaintiffs,

v.

THE ILLINOIS STATE BOARD OF
ELECTIONS; and BERNADETTE
MATTHEWS, in her capacity as the Executive
Director of the Illinois State Board of Elections,

Defendants,

ILLINOIS AFL-CIO and ILLINOIS
FEDERATION OF TEACHERS,

Intervenor-Defendants.

No. 1:24-cv-01867

Hon. Sara L. Ellis

**INTERVENOR-DEFENDANTS'
MOTION TO DISMISS AMENDED COMPLAINT**

The Illinois AFL-CIO and the Illinois Federation of Teachers (hereinafter, “Intervenor-Defendants”) hereby move this Court to dismiss Plaintiffs’ amended complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), for the reasons set forth in the accompanying Memorandum of Law.

WHEREFORE, Intervenor-Defendants request that the Court grant their Motion to Dismiss.

January 16, 2025

Respectfully Submitted,

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**Admitted pro hac vice*

***Pro hac vice motion pending*