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Attorneys for Defendant
Wyoming Secretary of State Chuck Gray

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

EQUALITY STATE POLICY CENTER,

Plaintiff,

v.

CHUCK GRAY, in his official capacity as
Wyoming Secretary of State, *et al.*,

Defendants.

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Case No.: 25-cv-000117-SWS

**DEFENDANT CHUCK GRAY'S MOTION TO DISMISS PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 12(b)(1)**

Defendant Wyoming Secretary of State Chuck Gray, by and through undersigned counsel, hereby moves to dismiss Plaintiff Equality State Policy Center's ("Plaintiff") Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1).

As set forth in the attached memorandum, Plaintiff does not have standing to challenge the constitutionality of the Proof of United States Citizenship requirement in House Bill 156, and therefore, this Court lacks subject matter jurisdiction over Plaintiff's claims.

Pursuant to Local Rule 7.1(a), Defendant requests a hearing on its motion.

DATED this 27th day of June, 2025.

By: /s/ Michael A. Columbo

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