

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AL SCHMIDT, in his official capacity as
Secretary of the Commonwealth, and the
COMMONWEALTH OF
PENNSYLVANIA,

Defendants.

Case No. 25-cv-1481
(Hon. Cathy Bissoon)

**[PROPOSED] NOTICE OF PENNSYLVANIA ALLIANCE FOR RETIRED
AMERICANS AND MIKE CROSSEY'S MOTION TO DISMISS**

Proposed Intervenor-Defendants the Pennsylvania Alliance for Retired Americans and Mike Crossey move to dismiss Plaintiff's Complaint under Fed. R. Civ. P. 12(b)(6). For the reasons discussed in the supporting memorandum filed alongside this Notice, Plaintiff's Complaint fails to state a claim upon which relief may be granted.

WHEREFORE, Proposed Intervenors request that the Court dismiss Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: December 16, 2025

Respectfully submitted,

/s/ Uzoma N. Nkwonta

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