

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

REPRESENTATIVE RONNY JACKSON,

Plaintiff,

v.

Case 2:25-cv-00197-Z

Hon. Matthew J. Kacsmaryk

SHIRLEY N. WEBER, in her official
capacity as California Secretary of State and
GAVIN NEWSOM, in his official capacity as
Governor of California,

Defendants.

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Defendants Gavin Newsom (in his official capacity as Governor of the State of California) and Dr. Shirley N. Weber (in her official capacity as California Secretary of State) move to dismiss Plaintiffs' complaint (ECF No. 1) for lack of subject matter jurisdiction, lack of personal jurisdiction, improper venue, and failure to state a claim. *See* Fed. R. Civ. P. 12(b)(1), 12(b)(2), 12(b)(3), 12(b)(6). In support, Defendants rely on the concurrently filed combined brief in Support of Defendants' Motion to Dismiss Plaintiff's Complaint and in Opposition to Plaintiff's Motion for a Preliminary Injunction. A proposed order will be submitted to the Court via e-mail as required by Local Rules and this Court's Judge-Specific Requirements.

Dated: September 30, 2025

Respectfully submitted,

/s/ Jennifer E. Rosenberg

JENNIFER E. ROSENBERG

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Weber*

CERTIFICATE OF INTERESTED PERSONS

In accordance with the Local Rules of the Northern District of Texas, the undersigned counsel for Defendants Gavin Newsom (in his official capacity as Governor of the State of California) and Dr. Shirley N. Weber (in her official capacity as California Secretary of State) hereby certifies that she is unaware of any persons, associations of persons, firms, partnerships, corporations, guarantors, insurers, affiliates, parent or subsidiary corporations, or other legal entities that are financially interested in the outcome of this case.

Dated: September 30, 2025

Respectfully submitted,

/s/ Jennifer E. Rosenberg

JENNIFER E. ROSENBERG

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