

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHANIE THOMAS, in her official
capacity as Secretary of the State of
Connecticut,

Defendant,

SEIU DISTRICT 1199NE, CONNECTICUT
ALLIANCE FOR RETIRED AMERICANS,
CONNECTICUT CITIZEN ACTION
GROUP, and BETTE MARAFINO,

Intervenor-Defendants,

and

COMMON CAUSE, and CLAIRE EWING,

Intervenor-Defendants.

Case No. 3:26-CV-00021-KAD

February 27, 2026

**MOTION TO DISMISS OF INTERVENOR-DEFENDANTS SEIU DISTRICT 1199NE,
CONNECTICUT ALLIANCE FOR RETIRED AMERICANS, CONNECTICUT CITIZEN
ACTION GROUP, AND BETTE MARAFINO**

Intervenor-Defendants SEIU District 1199NE, Connecticut Alliance for Retired Americans, Connecticut Citizen Action Group, and Bette Marafino (collectively, "Intervenors") move to dismiss Plaintiff's Complaint, ECF No. 1, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. For the reasons set forth in the accompanying memorandum, Plaintiff's Complaint fails to state a claim upon which relief may be granted. That memorandum also serves

as a combined opposition to Plaintiff's Motion for Order to Compel Records, ECF No. 9, and a response to the Court's Order to Show Cause, ECF No. 10.

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

Dated: February 27, 2026

Respectfully submitted,

/s/ William Bloss

William Bloss

CT Fed. Bar No. CT01008

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** *Pro Hac Vice* Application Pending

Counsel for Intervenor-Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2026, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ William Bloss

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