

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THE UNITED STATES OF
AMERICA,

Plaintiff,

v.

DR. DALE G. CALDWELL, in his
official capacity as Lieutenant General
and Secretary of State of New Jersey, *et*
al.,

Defendants.

No. 26-cv-02025 (ZNQ) (JTQ)

Electronically Filed

Motion Return Date:
July 6, 2026

**DEFENDANT DALE G.
CALDWELL'S NOTICE OF
MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

To: Hon. Zahid N. Quraishi, U.S.D.J.
Counsel of Record
(via CM/ECF)

PLEASE TAKE NOTICE that on July 6, 2026, Defendant Dale G. Caldwell, in his official capacity as Lieutenant General and Secretary of State of New Jersey, will move before the Honorable Zahid N. Quraishi, U.S.D.J., at the United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order dismissing Plaintiff's Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendant Caldwell will rely on the accompanying brief and all other pleadings and papers on file in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

JENNIFER DAVENPORT
ATTORNEY GENERAL OF NEW JERSEY

Dated: May 4, 2026

/s/ Robert A. Wiygul

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