

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CENTER FOR BIOLOGICAL DIVERSITY,

*Plaintiff,*

v.

U.S. DEPARTMENT OF INTERIOR, *et al.*,

*Defendants.*

Case No. 1:25-cv-00612-RDM

**DEFENDANTS' PARTIAL MOTION TO DISMISS**

Defendants hereby move under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) to dismiss with prejudice Count I and Count II of Plaintiff's amended complaint for lack of subject matter jurisdiction and for failure to state a claim upon which relief may be granted. The grounds for dismissal are set forth in the accompanying memorandum in support of Defendants' partial motion to dismiss. A proposed order is also attached.

DATED: May 27, 2025

Respectfully submitted,

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/s/ Samuel S. Holt  
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**CERTIFICATE OF SERVICE**

I certify that on May 27, 2025, I electronically filed the foregoing and attachments and thereby caused a copy to be served on counsel of record.

/s/ Samuel S. Holt  
SAMUEL S. HOLT