

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED SOCIETIES,  
633 Third Avenue, 8th Floor New York, NY 10017,

AMERICAN HISTORICAL ASSOCIATION,  
400 A Street SE Washington, DC 20003,

MODERN LANGUAGE ASSOCIATION,  
85 Broad Street, New York, NY 10004,

*Plaintiffs,*

v.

MICHAEL MCDONALD, in his official capacity as Acting  
Chairman of the National Endowment for the Humanities,  
400 7th St SW, Washington, DC 20506,

NATIONAL ENDOWMENT FOR THE HUMANITIES,  
400 7th St SW, Washington, DC 20506,

UNITED STATES DOGE SERVICE,  
736 Jackson Pl NW Washington, DC 20503,

AMY GLEASON, in her official capacity as Acting  
Administrator of the United States DOGE Service,  
736 Jackson Pl NW Washington, DC 20503,

NATE CAVANAUGH, in his official capacity as an employee  
of the U.S. DOGE Service or the General Services  
Administration,  
1800 F St NW Washington, DC 20006,

JUSTIN FOX, in his official capacity as an employee of the  
U.S. DOGE Service or the General Services Administration,  
1800 F St NW Washington, DC 20006,

*Defendants.*

No. 25 Civ. 3657 (CM)

THE AUTHORS GUILD, WILLIAM GOLDSTEIN,  
ELIZABETH KADETSKY, VALERIE ORLANDO,  
KATALIN BALOG, BENJAMIN HOLTZMAN,  
LEE JASPERSE, and NICOLE JENKINS,  
on behalf of themselves and all others similarly situated,

*Plaintiffs,*

v.

NATIONAL ENDOWMENT FOR THE HUMANITIES;

No. 25 Civ. 3923 (CM)

MICHAEL MCDONALD, in his official capacity as Acting  
Chairman of the National Endowment for the Humanities;

UNITED STATES DOGE SERVICE;

AMY GLEASON, in her official capacity as Acting  
Administrator of the United States DOGE Service;

NATE CAVANAUGH, in his official capacity as an employee  
of the U.S. DOGE Service or the General Services  
Administration; and,

JUSTIN FOX, in his official capacity as an employee of the  
U.S. DOGE Service or the General Services Administration,

*Defendants.*

## NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the Defendants' Motion to Dismiss, dated May 30, 2025, Defendants the National Endowment for the Humanities ("NEH"), Michael McDonald, in his official capacity as Acting Chairman of NEH, United States DOGE Service, Amy Gleason, in her official capacity as Acting Administrator of the U.S. DOGE Service, Nate Cavanaugh, in his official capacity as an employee of the U.S. DOGE Service or the General Services Administration, and Justin Fox, in his official capacity as an employee of the U.S. DOGE Service or the General Services Administration, through their

attorney, Jay Clayton, United States Attorney for the Southern District of New York, hereby move this Court for an order dismissing the above-referenced consolidated actions under Rule 12 of the Federal Rules of Civil Procedure.

Dated: New York, New York  
May 30, 2025

Respectfully submitted,

JAY CLAYTON  
United States Attorney for  
the Southern District of New York  
Attorney for Defendants

By: /s/ Mary Ellen Brennan  
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