

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

AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL
EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

SOCIAL SECURITY
ADMINISTRATION, *et al.*,

Defendants.

Case No. 1:25-cv-00596-ELH

**DEFENDANTS' MOTION TO DISMISS OR, IN THE ALTERNATIVE,
FOR SUMMARY JUDGMENT**

Defendants hereby move under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) to dismiss with prejudice all counts of Plaintiffs' amended complaint for lack of subject matter jurisdiction and for failure to state a claim upon which relief may be granted. In the alternative, Defendants move for summary judgment under Federal Rule of Civil Procedure 56. The grounds for dismissal and summary judgment are set forth in the accompanying memorandum in support. A proposed order is also attached.

Dated: June 20, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on June 20, 2025, I electronically filed the foregoing and attachments and thereby caused a copy to be served on counsel of record.

/s/ Samuel S. Holt
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