

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Madeline Pavsek, Ethan Sykes,
DSCC, and DCCC,

Plaintiffs,

vs.

Steve Simon, in his official capacity as the
Minnesota Secretary of State,

Defendant.

Civil No. 19-CV-3000 (SRN/DTS)

**DEFENDANT'S
MOTION TO DISMISS COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Steve Simon, in his official capacity as the Minnesota Secretary of State, respectfully moves the Court for an order dismissing all claims in Plaintiffs' Complaint for failure to state a claim upon which relief can be granted.

This motion is based on the Memorandum of Law filed herewith, and on all the files, records, and proceedings herein.

Dated: December 27, 2019

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

s/ **Nathan J. Hartshorn**
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SIMON, IN HIS OFFICIAL CAPACITY AS
THE MINNESOTA SECRETARY OF STATE