

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

PHILADELPHIA YEARLY MEETING OF
THE RELIGIOUS SOCIETY OF FRIENDS,
et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

Civil Action No. 8:25-cv-00243-TDC

DEFENDANTS' PARTIAL MOTION TO DISMISS

Defendants, by and through counsel, respectfully submit this Partial Motion to Dismiss Counts III-VI of Plaintiffs' Amended Complaint, ECF No. 28. As set forth in Defendants' accompanying Memorandum in Support, Counts III-VI, which consist of Plaintiffs' claims brought pursuant to the Administrative Procedure Act, 5 U.S.C. §§ 701, *et. seq.*, should be dismissed for lack of subject matter jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(1), or alternatively, for failure to state a claim upon which relief may be granted pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: April 17, 2025

Respectfully submitted,

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