

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

FREESTATE JUSTICE,

Plaintiff,

v.

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION and ANDREA LUCAS, in  
her official capacity as CHAIR of the  
EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,

Defendants.

No. 1:25-cv-02482-GLR

**DEFENDANTS' MOTION TO DISMISS**

Defendants, by and through their undersigned counsel, respectfully move to dismiss Plaintiff's Complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The grounds for this motion are set forth in the accompanying memorandum.

Dated: October 15, 2025

Respectfully submitted,

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/s/ Christian Dibblee  
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