

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

The Estate of Gene B. Lokken and The
Estate of Dale Henry Tetzloff, individually
and on behalf of all others similarly situated,

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC.,
UNITED HEALTHCARE, INC.,
NAVIHEALTH, INC. and Does 1-50,
inclusive,

Defendants.

Civil File No. 23-cv-03514-JRT-DTS

**DEFENDANTS' MOTION TO
DISMISS THE CLASS ACTION
COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants hereby move the Court for an order dismissing the Class Action Complaint with prejudice.

This Motion to Dismiss the Complaint is based on Defendants' Memorandum of Law in Support of this Motion, declarations and exhibits thereto, all files and records of this case and upon such other evidence and argument as the Court may permit at the hearing of this matter.

Dated: February 5, 2024

DORSEY & WHITNEY LLP

By /s/ Michelle S. Grant
Nicole Engisch (#0215284)
engisch.nicole@dorsey.com
Michelle S. Grant (#0311170)
grant.michelle@dorsey.com
Shannon L. Bjorklund (#0389932)
bjorklund.shannon@dorsey.com
David C. Racine (#0401060)
racine.david@dorsey.com
50 South Sixth Street, Suite 1500
Minneapolis, MN 55402
Telephone: (612) 340-2600
Facsimile: (612) 340-2868

Nicholas J. Pappas (admitted *pro hac vice*)
pappas.nicholas@dorsey.com
DORSEY & WHITNEY LLP
51 West 52nd Street
New York, NY 10019-6119
Telephone: (212) 415-9387

Attorneys for Defendants