UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

The Estate of Gene B. Lokken, Glennette Kell, Darlene Buckner, Carol Clemens, Frank Chester Perry, The Estate of Jackie Martin, John J. Williams, as Trustee of the Miles and Carolyn Williams 1993 Family Trust, and William Hull, individually and on behalf of all others similarly situated,

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

Plaintiffs,

DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED CLASS ACTION COMPLAINT

VS.

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

Defendants.

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

This Motion to Dismiss the First Amended 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: May 20, 2024 DORSEY & WHITNEY LLP

By /s/ Michelle S. Grant

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