

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

STATE OF MISSOURI,

*Plaintiff,*

v.

U.S. DEPARTMENT OF HEALTH AND  
HUMAN SERVICES, *et al.*,

*Defendants.*

Case No. 4:25-cv-77-JAR

**DEFENDANTS' MOTION TO DISMISS**

Defendants move to dismiss Plaintiff's Complaint for Declaratory and Injunctive Relief, ECF No. 1, under Federal Rule of Civil Procedure 12(b)(1) for lack of subject-matter jurisdiction. The grounds for this motion are set forth in the accompanying Memorandum in Support of Defendants' Motion to Dismiss.

Dated: March 31, 2025

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

ERIC B. BECKENHAUER  
Assistant Branch Director

/s/ Jody D. Lowenstein  
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**CERTIFICATE OF SERVICE**

On March 31, 2025, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Eastern District of Missouri, using the Court's electronic case filing system. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Jody D. Lowenstein  
JODY D. LOWENSTEIN  
Trial Attorney  
U.S. Department of Justice