

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN FEDERATION OF
GOVERNMENT
EMPLOYEES, AFL-CIO, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States of America, *et al.*,

Defendants.

Civil Action No. 1:25-cv-00264

MOTION TO DISMISS

Defendants respectfully move to dismiss the complaint pursuant to Rule 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure. The reasons for this motion are set forth in the accompanying Memorandum in Support of Defendants' Motion to Dismiss.

Dated: April 22, 2025

Respectfully submitted,

ERIC HAMILTON
Deputy Assistant Attorney General
Federal Programs Branch

CHRISTOPHER R. HALL
Assistant Branch Director

/s/ Jason Altabet
Jason Altabet
(MD Bar No. 2211280012)
Kevin K. Bell
(GA Bar No. 967210)
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L St. NW
Washington, DC 20005
Phone: (202) 305-0727

E-mail: Jason.K.Altabet2@usdoj.gov
Counsel for the United States

CERTIFICATE OF SERVICE

On April 22, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court for the District of Columbia, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically as authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Jason Altabet

Jason Altabet

(MD Bar No. 2211280012)

Kevin K. Bell

(GA Bar No. 967210)

Trial Attorney

United States Department of Justice

Civil Division, Federal Programs Branch

1100 L St. NW

Washington, DC 20005

Phone: (202) 305-0727

E-mail: Jason.K.Altabet2@usdoj.gov

Counsel for the United States