

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

Alliance for Hippocratic Medicine, *et al.*,

Plaintiffs,

and

State of Missouri, *et al.*,

Intervenor-Plaintiffs,

v.

U.S. Food and Drug Administration, *et al.*,

Defendants,

and

Danco Laboratories, LLC,

Intervenor-Defendant.

Case No. 2:22-cv-00223-Z

DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(3), Defendants hereby respectfully move to dismiss both Plaintiffs' Complaint (ECF No. 1) and the Intervenor States' operative Complaint (ECF No. 176). In the alternative, Plaintiffs' Complaint should be dismissed and the Intervenor States' Complaint should be transferred to a District where venue would be proper—*i.e.*, the District of Columbia, the District of Maryland, the Western District of Missouri, the District of Idaho, or the District of Kansas. The reasons supporting this motion are set forth in the accompanying Memorandum, and a proposed order is attached.

November 1, 2024

Respectfully submitted,

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