

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED SOVEREIGN :  
AMERICANS, INC., DIANE :  
HOUSER, RUTH MOTON *and* :  
DEAN DREIBELBIS, :

Plaintiffs :

v. :

COMMONWEALTH OF :  
PENNSYLVANIA, AL SCHMIDT, :  
PENNSYLVANIA BUREAU OF :  
ELECTIONS, PENNSYLVANIA :  
BUREAU OF ELECTION :  
SECURITY AND TECHNOLOGY, :  
PENNSYLVANIA DEPARTMENT :  
OF STATE, MICHELLE HENRY, :  
PENNSYLVANIA OFFICE OF :  
ATTORNEY GENERAL, :  
MERRICK GARLAND *and* :  
UNITED STATES DEPARTMENT :  
OF JUSTICE, :

Defendants :

No. 1:24-CV-01003

Magistrate Judge Bloom

Electronically Filed Document

*Complaint Filed 06/18/24*

**DEFENDANTS’ MOTION TO DISMISS PLAINTIFFS’ COMPLAINT**

AND NOW, come Defendants the Commonwealth of Pennsylvania, the Pennsylvania Office of Attorney General, and Attorney General Michelle Henry, by and through undersigned counsel, and file this Motion, pursuant to Fed. R. Civ. P. 12(b)(6) to dismiss the Plaintiffs’ allegations against them with prejudice. A

brief in support of this motion will be filed within the period provided for under Local Rule 7.5.

WHEREFORE, for the reasons further detailed in Defendants' forthcoming Brief in Support, their Motion should be granted. Defendants have contacted Plaintiffs' Counsel, who does not concur in this Motion.

**Respectfully submitted,**

**MICHELLE A. HENRY**  
**Attorney General**

**By: s/ ERICH T. GREINER**

**ERICH T. GREINER**  
**Deputy Attorney General**  
**Attorney ID 331601**

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**Date: July 22, 2024**

**Counsel for Defendants the**  
**Commonwealth of Pennsylvania, The**  
**Pennsylvania Office of Attorney**  
**General, and Attorney General**  
**Michelle Henry**

**CERTIFICATE OF CONCURRENCE**

I, Erich T. Greiner, Deputy Attorney General, hereby certify that I have sought concurrence from Plaintiffs' counsel, and he does not concur in this Motion.

**s/ ERICH T. GREINER**  
**ERICH T. GREINER**  
Deputy Attorney General

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**CERTIFICATE OF SERVICE**

I, Erich T. Greiner, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on July 22, 2024, I caused to be served a true and correct copy of the foregoing document titled *Defendants' Motion to Dismiss Plaintiffs' Complaint* to the following:

**VIA ELECTRONIC FILING**

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*Counsel for Defendants Pennsylvania Bureau  
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Pennsylvania Bureau of Elections,  
Pennsylvania Department of State, and Al  
Schmidt*

*s/ ERICH T. GREINER*  
**ERICH T. GREINER**  
Deputy Attorney General

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, upon  
consideration of the *Defendants' Motion to Dismiss Plaintiffs' Complaint*, it is  
hereby ORDERED that the Motion is GRANTED.

All allegations contained in the Complaint against Defendants the  
Commonwealth of Pennsylvania, the Pennsylvania Office of Attorney General, and  
Attorney General Michelle Henry, are hereby dismissed WITH PREJUDICE. It is

further ORDERED that the above-named Defendants are hereby excused from any further proceedings in the above-captioned matter.

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**HONORABLE DARYL F. BLOOM**  
**United States District Magistrate Judge**