

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL UNION, UNITED  
AUTOMOBILE, AEROSPACE AND  
AGRICULTURAL IMPLEMENT WORKERS OF  
AMERICA, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF STATE,  
*et al.*,

Defendants.

25 Civ. 8566 (AKH)

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**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendants' Motion to Dismiss, the Defendants, by their attorney, Jay Clayton, United States Attorney for the Southern District of New York, hereby moves for an order dismissing the Complaint under Federal Rule of Civil Procedure 12(b)(1).

Dated: February 20, 2026  
New York, New York

Respectfully submitted,

JAY CLAYTON  
United States Attorney

By: /s/ Jennifer Jude  
Assistant United States Attorney  
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