

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

THE DISTRICT OF COLUMBIA, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States and in his individual
capacity,

Defendants.

No. 8:17-cv-1596-PJM

**MOTION TO DISMISS ON BEHALF OF DEFENDANT
IN HIS INDIVIDUAL CAPACITY**

Defendant Donald J. Trump, President of the United States, hereby moves to dismiss the Amended Complaint with prejudice, as it relates to him in his individual capacity, for lack of subject-matter jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(1), lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2), improper venue pursuant to Federal Rule of Civil Procedure 12(b)(3), and failure to state a claim upon which relief can be granted pursuant to Federal Rule of Civil Procedure 12(b)(6). The grounds for this Motion to Dismiss on Behalf of Defendant in His Individual Capacity are set forth in the accompanying Memorandum of Law.

Respectfully submitted,

/s/ William S. Consovoy

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May 1, 2018

CERTIFICATE OF SERVICE

I certify that on May 1, 2018, I electronically filed this document with the Clerk of Court for the U.S. District Court for the District of Maryland using the CM/ECF system, which will send notification of the filing to all counsel.

/s/ William S. Consovoy _____
William S. Consovoy

Attorney for Defendant in his individual capacity