

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

---

WILLIAM WHITFORD, et al.,

Plaintiffs,

Case No. 3:15-CV-00421-jdp

v.

BEVERLY R. GILL, et al.,

Defendants.

---

**WISCONSIN STATE ASSEMBLY'S MOTION TO DISMISS**

---

Intervenor-Defendant Wisconsin State Assembly, through its attorneys, hereby moves to dismiss the complaint pursuant to Fed. R. of Civ. P. 12(b)(6). For the reasons stated in the attached Brief In Support Of Wisconsin State Assembly's Motion To Dismiss, Plaintiffs Amended Complaint fails to state a justiciable claim for which relief can be granted.

Intervenors request the court enter an order and judgment dismissing the complaint.

Respectfully submitted this 4th day of October, 2018.

**BELL GIFTOS ST. JOHN LLC**

/s/ Kevin St. John

Kevin St. John, SBN 1054815

5325 Wall Street, Suite 2200

Madison, WI 53718-7980

Ph. 608-216-7990

Fax 608-216-7999

Email: [kstjohn@bellgiftos.com](mailto:kstjohn@bellgiftos.com)

**Attorneys for Wisconsin State Assembly**