IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, *Plaintiff*, *v.* ANTHONY ALBENCE, in his official capacity as State Election Commissioner for the State of Delaware, *Defendant*, Bethany Jennings and Gemma Lowery, *Intervenor-Defendants*, Latin American Community Center, *et al.*, *Intervenor-Defendants*.	Case No. 25-cv-01453-RGA Hon. Richard G. Andrews

BETHANY JENNINGS AND GEMMA LOWERY'S MOTION TO DISMISS

Intervenors Bethany Jennings and Gemma Lowery move to dismiss Plaintiff's Complaint for declaratory and injunctive relief, D.I. 1, with prejudice.

For the reasons discussed in the supporting brief filed alongside this Motion, the Complaint fails to state a claim under Federal Rule of Civil Procedure 12(b)(6).

WHEREFORE, Intervenors respectfully request that the Court grant their motion to dismiss with prejudice in the above-captioned matter.

February 9, 2026

Respectfully submitted,

/s/ Mark Billion (DE Bar #5263)

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