

STATE OF MINNESOTA**DISTRICT COURT****COUNTY OF HENNEPIN****FOURTH JUDICIAL DISTRICT**Case Type
Civil/Other/Misc.

Minnesota Gun Owners Caucus

Court File No. 62-CV-25-9927

Plaintiff,

Judge Leonardo Castro

v.

City of Saint Paul, Minnesota,

**NOTICE OF MOTION AND
MOTION TO DISMISS
PLAINTIFF'S AMENDED
COMPLAINT**

Defendant.

To: Plaintiff, above-named and its attorney, Rob Doar, 716 County Road 10 NE, Suite 116, Minneapolis, MN, 55434

PLEASE TAKE NOTICE that the undersigned for Defendant City of Saint Paul, Minnesota, will bring the following Motion to Dismiss Plaintiff's Amended Complaint on for hearing before the Honorable Judge Leonardo Castro, via Zoom, on April 14, 2026, at 1:30 p.m., pursuant to Minnesota Rule of Civil Procedure 12.02, for an Order dismissing Plaintiff's Amended Complaint in its entirety with prejudice. Further instructions from the Court will follow.

MOTION

Pursuant to the Minnesota Rules of Civil Procedure, Defendant City of Saint Paul, Minnesota, ("Defendant") moves the Court as follows:

For an Order dismissing Plaintiff's Amended Complaint in its entirety with prejudice pursuant to Minnesota Rule of Civil Procedure 12.02, including but not limited to, Rule 12.02(a), lack of subject matter jurisdiction and (e), failure to state a cause of

action. Defendant's Motion is based upon the Rules of Civil Procedure for the District Courts and the files, records, exhibits, affidavits, pleadings, arguments by counsel, and the forthcoming memorandum of law to be filed herein in accordance with the Minnesota General Rules of Practice. In making this Motion, the City does not waive any defenses, including but not limited to jurisdiction, and reserves all rights.

Dated: January 27, 2026

IRENE KAO
City Attorney

s/ Alexander Hsu
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Attorneys for Defendant

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