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Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF IDAHO**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
ACE BLACK RANCHES, LLP,  
  
Defendant.

Case No.: 1:24-cv-00113-DCN

**ACE BLACK RANCHES, LLP'S  
MOTION TO DISMISS**

Defendant Ace Black Ranches, LLP (“ABR”), by and through its counsel of record named above, hereby moves this Court for an Order dismissing Plaintiff United States of America’s Complaint (Dkt. 1), pursuant to Fed. R. Civ. P. 12(b)(6). This Motion is supported by the Memorandum filed concurrently herewith.

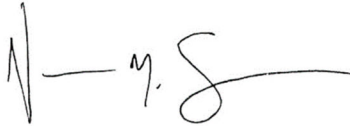
Oral Argument is Requested.

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DATED this 29<sup>th</sup> day of April, 2024.

PARSONS BEHLE & LATIMER



Norman M. Semanko; Garrett M. Kitamura

MOUNTAIN STATES LEGAL FOUNDATION

/s/ Ivan L. London

Ivan L. London

Attorneys for Defendant Ace Black Ranches, LLP

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 29th day of April, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following persons:

<p>Todd Kim, Assistant Attorney General          Joshua D. Hurwit, U.S. Attorney          Christine G. England, Assistant U.S. Attorney          District of Idaho          1290 W. Myrtle Street, Suite 500          Boise, ID 83702-7788</p>	<p>Fax – 208/334-9375          Email – <a href="mailto:Christine.England@usdoj.gov">Christine.England@usdoj.gov</a></p>
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