

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RYAN THOMAS,)	
)	
Plaintiff,)	
)	No. 20 CV 734
v.)	Honorable Judge Mary M. Rowland
)	
ILLINOIS STATE POLICE, <i>et al.</i>)	
)	
Defendants.)	

**DEFENDANTS’ MOTION TO DISMISS PURSUANT TO FEDERAL RULES OF CIVIL
PROCEDURE 12(b)(1)**

Defendants Illinois State Police, Brendan Kelly, and Jessica Trame, by and through their attorney Kwame Raoul, Attorney General for the State of Illinois, and pursuant to Federal Rules of Civil Procedure 12(b)(1), hereby move to dismiss Plaintiffs’ Amended Complaint with prejudice. In support of this Motion, Defendants state as follows:

1. Plaintiff Lazic’s claims are moot, as he has been granted both a FOID card and a Concealed Carry License (“CCL”).
2. Plaintiff Thomas’s claims with regard to a FOID card are moot; his claims with regard to a CCL are not yet ripe for review.
3. Plaintiff Singleton lacks standing, and his claim is not ripe for review.
4. The Organizational Plaintiffs lack standing to bring the instant lawsuit.
5. Defendants contemporaneously file a supporting memorandum of law.

WHEREFORE, Defendants respectfully request that the Court grant their motion to dismiss.

Dated: August 24, 2020

Respectfully Submitted,

KWAME RAOUL
Attorney General of Illinois

/s/ Amanda L. Kozar
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CERTIFICATE OF SERVICE

The undersigned certifies that on August 24, 2020, she electronically filed the foregoing document with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system. All participants in the case are registered CM/ECF users who will be served by the CM/ECF system.

Respectfully Submitted,

/s/ Amanda L. Kozar
AMANDA L. KOZAR