

Benjamin C. Mizer  
Principal Deputy Assistant Attorney General  
Judry L. Subar  
Assistant Branch Director, Federal Programs Branch  
Christopher R. Hall  
Senior Counsel  
United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Ave., NW  
Washington, DC 20530  
Tel: (202) 514-4778  
Fax: (202) 616-8470  
[Christopher.Hall@usdoj.gov](mailto:Christopher.Hall@usdoj.gov)

Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

HUGH HELD and  
KELLY RICHARDSON-WRIGHT,  
on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

CAROLYN W. COLVIN,  
Acting Commissioner of Social  
Security,

Defendant.

Case No.: 2:15-cv-1732

NOTICE OF MOTION AND MOTION TO  
DISMISS FOR LACK OF SUBJECT-MATTER  
JURISDICTION

Hearing on Motion  
Date: July 20, 2015  
Time: 1:30 p.m.  
Place: 312 North Spring Street, Los  
Angeles, CA 90012, Courtroom 15

Honorable Percy Anderson

To the Court and the Plaintiffs:

Please take notice that on July 20, 2015, at 1:30 p.m., or as soon thereafter as  
this matter may be heard, in Courtroom 15 in the United States Courthouse located at  
312 North Spring Street, Los Angeles, California, Defendant will, and hereby does,

1 move this Court for an order dismissing Plaintiffs' Complaint for lack of jurisdiction  
2 under Federal Rule of Civil Procedure 12(b)(1).

3 This motion is based on this Notice of Motion and Motion to Dismiss, the  
4 Memorandum In Support of Defendant's Motion to Dismiss for Lack of Subject-  
5 Matter Jurisdiction filed herewith, and such other evidence and argument as the Court  
6 may consider.  
7  
8

9 Date: June 17, 2015

Respectfully submitted,

Benjamin C. Mizer  
Principal Deputy Assistant Attorney General

Judry L. Subar  
Assistant Branch Director, Federal Programs Branch

14 */s/ Christopher R. Hall* \_\_\_\_\_

15 Christopher R. Hall  
16 Senior Counsel  
United States Department of Justice  
Civil Division, Federal Programs Branch  
17 20 Massachusetts Ave., NW  
Washington, DC 20530  
18 Tel: (202) 514-4778  
Fax: (202) 616-8470  
19 [Christopher.Hall@usdoj.gov](mailto:Christopher.Hall@usdoj.gov)

20 Attorneys for Defendant  
21  
22  
23  
24  
25  
26  
27  
28