

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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|------------------------------------|---|-------------------|
| FRANCISCO MOLINA, | : | |
| Plaintiff, | : | No. 19-0019 |
| vs. | : | |
| PENNSYLVANIA SOCIAL SERVICE UNION, | : | Judge Yvette Kane |
| ET AL., | : | |
| Defendants. | : | |

**DEFENDANT LEHIGH COUNTY BOARD OF COMMISSIONERS’
MOTION TO DISMISS PLAINTIFF’S FIRST AMENDED COMPLAINT**

For the reasons set forth in the simultaneously-filed Brief in Support of Lehigh County Board of Commissioners’ Motion to Dismiss Plaintiff’s First Amended Complaint, which is incorporated herein by this reference as if set forth in full, Defendant Lehigh County Board of Commissioners requests that:

1. Plaintiff’s claims for prospective declaratory and injunctive relief be dismissed for lack of jurisdiction.
2. Plaintiff’s claims for retrospective monetary relief arising from Defendants’ receipt of post-resignation dues be dismissed for lack of jurisdiction.
3. Count I be dismissed in its entirety for lack of jurisdiction over the relief sought therein.

4. The potential relief under Counts II and III be limited to recovery of pre-resignation dues.

Respectfully Submitted:

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