

**UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION**

**The State of KANSAS, *et al.*,**

***Plaintiffs,***

**v.**

**UNITED STATES OF AMERICA and the  
CENTERS FOR MEDICARE &  
MEDICAID SERVICES,**

***Defendants.***

**CIVIL ACTION NO. 1:24-cv-00150-  
DMT-CRH**

**ORAL ARGUMENT REQUESTED**

**PROPOSED DEFENDANT-INTERVENORS' NOTICE OF MOTION TO TRANSFER**

Please take notice that Proposed Defendant-Intervenors Claudia Moya Lopez, Hyun Kim, Dania Quezada Torres, and CASA, Inc., are moving this Court under 28 U.S.C. § 1406(a) to transfer this case to the U.S. District Court for the District of Columbia. As discussed in the Proposed Defendant-Intervenors' accompanying Memorandum of Law, this case should be transferred because Plaintiff State of North Dakota lacks Article III standing and therefore cannot provide a proper basis for venue under 28 U.S.C. § 1391(e). The interest of justice favors transferring this case to the U.S. District Court for the District of Columbia because, compared to dismissal, transfer will save the parties the time and expense of re-filing this case. Defendant-Intervenors request oral argument on the Motion to assist the Court's decision-making process.

Date: September 20, 2024

Respectfully submitted,

Nicholas Espiritu (*pro hac vice  
forthcoming*)  
Gabrielle Lessard (*pro hac vice  
forthcoming*)  
Tanya Broder (*pro hac vice forthcoming*)  
NATIONAL IMMIGRATION LAW  
CENTER  
3450 Wilshire Blvd.  
Suite 108 – 62  
Los Angeles, CA 90010  
espiritu@nilc.org  
lessard@nilc.org  
broder@nilc.org  
Telephone: 213.639.3900  
Facsimile: 213.639.3911

Joanna E. Cuevas Ingram (*pro hac vice  
forthcoming*)  
Hilda Bonilla (*pro hac vice forthcoming*)  
NATIONAL IMMIGRATION LAW  
CENTER  
P.O. Box 34573  
Washington, DC 20043  
cuevasingram@nilc.org  
bonilla@nilc.org  
Telephone: 202.216.0261  
Facsimile: 202.216.0266

/s/ Matthew S. Rozen

Matthew S. Rozen  
John Matthew Butler  
GIBSON, DUNN & CRUTCHER LLP  
1700 M Street, N.W.,  
Washington, D.C. 20036  
mrozen@gibsondunn.com  
mbutler@gibsondunn.com  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

Betty X. Yang  
byang@gibsondunn.com  
GIBSON, DUNN & CRUTCHER LLP  
2001 Ross Avenue Suite 2100  
Dallas, Texas 75201  
Telephone: 214.698.3100  
Facsimile: 214.571.2900

*Attorneys for Proposed Defendant-Intervenors*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 20, 2024, a true and correct copy of the foregoing notice was served via electronic service on counsel for all parties.

/s/ Matthew S. Rozen  
Matthew S. Rozen