

**WHITE EARTH BAND OF OJIBWE  
IN TRIBAL COURT**

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MANOOMIN, et al.

Court File No. GC21-0428  
Hon. David DeGroat

Plaintiffs,

vs.

**MOTION TO DISMISS**

MINNESOTA DEPARTMENT OF  
NATURAL RESOURCES, et al.

Defendants.

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Defendants Minnesota Department of Natural Resources, Commissioner Sarah Strommen, Barb Naramore, Randall Doneen, and ten unnamed John Doe conservation officers move to dismiss all counts of the plaintiffs' complaint pursuant to White Earth Band of Ojibwe Rules of Civil Procedure XVI(b)(1) for lack of subject matter jurisdiction. The bases of the motion are more fully set forth in the defendants' memorandum in support of this motion.

Dated: August 12, 2021

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

s/ Oliver J. Larson

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