

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MUSCOGEE CREEK INDIAN FREEDMEN)	
BAND, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. 18-cv-01705 (CKK)
RYAN ZINKE, Secretary of the Interior,)	
U.S. DEPARTMENT OF THE)	
INTERIOR, AND JAMES FLOYD,)	
)	
Defendants.)	

FEDERAL DEFENDANTS’ MOTION TO DISMISS

Pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, Ryan Zinke and the U.S. Department of the Interior (“Federal Defendants”) hereby move to dismiss all claims against Federal Defendants for lack of jurisdiction. As further detailed in the attached memorandum, the Court lacks jurisdiction over these claims because they are barred by the jurisdictional six-year statute of limitations in 28 U.S.C. § 2401(a).

Respectfully submitted this 5th day of October, 2018,

JEFFREY H. WOOD
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CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2018, I electronically filed the foregoing document and its attachments with the Clerk of Court using the CM/ECF system, which will send notification of the filing to all parties.

/s/ Amber Blaha
Amber Blaha