

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

**GREGORY T. ANGELO, et al.,**

**Plaintiff,**

**v.**

**CHIEF MICHAEL ANZALLO, et al.,  
in his official and individual capacity.**

**Defendants.**

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**Case No: 1:22-cv-01878-RDM**

**MOTION TO DISMISS**

Defendant Michael Anzallo (“Chief Anzallo) of the Metro Transit Police Department (MTPD), pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), hereby moves this Court to dismiss Plaintiffs’ Amended Complaint. As set forth in greater detail in the accompanying Memorandum of Law, Plaintiffs’ Amended Complaint must be dismissed for lack of subject matter jurisdiction, and for failure to state a claim for which relief may be granted.

WHEREFORE, for the foregoing reasons as stated in greater detail in the accompanying Memorandum of Law, Chief Anzallo respectfully requests that this motion be granted and that Plaintiffs’ claims against him be dismissed with prejudice.

Respectfully submitted,

WASHINGTON METROPOLITAN AREA  
TRANSIT AUTHORITY

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 1st day of March 2023, a copy of the Motion to Dismiss, Memorandum of Law in Support of the Motion to Dismiss Plaintiff's Amended Complaint, and proposed Order was electronically filed and sent via the court's ECF system to:

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