

A. Lack of Subject Matter Jurisdiction – Rule 12(b)(1)

This Court lacks jurisdiction because **[explain why: e.g., Plaintiff has no standing; there is no federal question; the claim is barred by sovereign immunity, etc.]**. Under *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992), standing requires an injury that is “concrete and particularized” and “actual or imminent.”

[Insert optional supporting local precedent or statute: e.g., “Under [STATE or LOCAL RULE], Plaintiff must demonstrate that...”]

B. Failure to State a Claim – Rule 12(b)(6)

Even if jurisdiction were proper, the Complaint fails to meet the pleading standards set forth in *Ashcroft v. Iqbal*, 556 U.S. 662 (2009) and *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007). Plaintiff’s allegations consist of **[explain deficiencies: e.g., legal conclusions, vague assertions, insufficient facts]** and do not plausibly support any recognized cause of action under **[cite applicable law, e.g., 42 U.S.C. § 1983, Title VII, etc.]**.

[Optional Jurisdiction-Specific Rule Insert: e.g., “Under Local Rule [____], complaints must specify...”]

III. CONCLUSION

For the reasons stated above, Defendant respectfully requests that this Court:

1. Grant this Motion to Dismiss;
2. Dismiss Plaintiff’s Complaint in its entirety **[with or without prejudice]**; and
3. Award any other relief this Court deems just and proper.

Respectfully submitted,

[Your Name]

[Law Firm Name]

[Bar Number if applicable]

[Address]

[Phone] | [Email]

Attorney for Defendant

Date: [_____]