

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

JOSEPH KIRCHNER,

Plaintiff,

v.

MIKE JOHNSON, in his individual and official capacity as Speaker of the United States House of Representatives;
DONALD J. TRUMP, in his individual capacity as former and current President of the United States;
PAM BONDI, in her individual and official capacity as Attorney General of the United States;
BRENDAN CARR, in his individual and official capacity as Chairman of the Federal Communications Commission;
THE UNITED STATES HOUSE OF REPRESENTATIVES;
ANTHROPIC, PBC;
OPENAI, INC.;
APPLE INC.;
COMCAST CABLE COMMUNICATIONS, LLC;
METR (MODEL EVALUATION & THREAT RESEARCH);
and DOES 1-20, unknown co-conspirators,

Defendants.

Civil Action No. 1:25-cv-02735-ACR

**CORPORATE DEFENDANTS' JOINT MOTION TO DISMISS
PLAINTIFF JOSEPH KIRCHNER'S THIRD AMENDED COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF**

For the reasons detailed in the accompanying memorandum of law, Defendants Anthropic, PBC; Apple Inc.; Comcast Cable Communications, LLC; OpenAI Foundation (f/k/a OpenAI, Inc.); and Model Evaluation and Threat Research (METR) (the "Corporate Defendants"); respectfully request that the Court dismiss Plaintiff Joseph Kirchner's Third Amended Complaint against them with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(1) for lack of subject matter jurisdiction and 12(b)(6) for failure to state a claim.

Dated: July 15, 2026

Respectfully Submitted,

ANTHROPIC, PBC

/s/ Tara N. Tighe

Danny C. Onorato

Tara N. Tighe

Schertler Onorato Mead Sears & Manning

555 13th Street NW | Suite 500 West

Washington, DC 20004

donorato@schertlerlaw.com

ttighe@schertlerlaw.com

Phone: (202) 628-4199

Fax: (202) 628-4177

APPLE INC.

/s/ Kartik Narayan Venguswamy

Kartik Narayan Venguswamy

ArentFox Schiff

1717 K Street NW

Washington, DC 20006

kartik.venguswamy@afslaw.com

Phone: (202) 350-3734

Fax: (202) 857-6395

**COMCAST CABLE
COMMUNICATIONS, LLC**

/s/ Jason F. Hoffman

Jason F. Hoffman

Baker & Hostetler LLP

1050 Connecticut Avenue NW | Suite 1100

Washington, DC 20036

jhoffman@bakerlaw.com

Phone: (202) 861-1657

Fax: (202) 861-1783

OPEN AI FOUNDATION (f/k/a/ OPENAI, INC.)

/s/ Benjamin D. Margo

Benjamin D. Margo

Wilson Sonsini Goodrich & Rosati

31 West 52nd Street | Fifth Floor

New York, NY 10019

bmargo@wsgr.com

Phone: (212) 497-7732
Fax: (866) 974-7329

Edward Peter Percarpio
Wilson Sonsini Goodrich & Rosati
1700 K Street NW
Washington, DC 20006
epercarpio@wsgr.com
Phone: (202) 973-8898
Fax: (866) 974-7329

**MODEL EVALUATION
AND THREAT RESEARCH (METR)**

/s/ Niyati Ahuja
Niyati Ahuja (*pro hac vice*)
Reed Smith LLP
599 Lexington Avenue | 22nd Floor
New York, NY 10022
nahuja@reedsmith.com
Phone: (212) 521-5400
Fax: (212) 521-5450

Selina Coleman
Reed Smith LLP
1301 K Street NW | Suite 1000 - East Tower
Washington, DC 20005
scoleman@reedsmith.com
Phone: (202) 414-9220
Fax: (202) 414-9299

CERTIFICATE OF SERVICE

I certify that on July 15, 2026, a true and correct copy of the forgoing document was filed and served on all registered case participants, including Plaintiff Joseph Kirchner, using the Court's electronic case filing system.

Respectfully Submitted,

/s/ Tara N. Tighe

Tara N. Tighe | DC Bar No. 1742435