IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

HO-CHUNK NATION,

Plaintiff,

v.

KALSHI INC., KALSHIEX LLC, ROBINHOOD MARKETS, INC., ROBINHOOD DERIVATIVES LLC, AND DOES 1-20,

Defendants.

Case No. 3:25-cv-00698

KALSHI DEFENDANTS' MOTION TO DISMISS

For the reasons stated in the Brief filed concurrently with this Motion, Defendants Kalshi Inc. and KalshiEX LLC (the "Kalshi Defendants") move to dismiss the Complaint for Declaratory and Injunctive Relief and Money Damages (ECF No. 1) with prejudice under Federal Rule of Civil Procedure 12(b)(6), and under Federal Rule of Civil Procedure 12(b)(1) with respect to the Fourth Cause of Action.

Dated: November 21, 2025 Respectfully submitted,

/s/ Sarah A. Zylstra

Sarah A. Zylstra (State Bar No. 1033159) szylstra@boardmanclark.com Boardman & Clark LLP 1 South Pinckney Street, Suite 410 P.O. Box 927 Madison, WI 53701 Telephone: (608) 257-9521

Telephone: (608) 257-9521 Facsimile: (608) 283-1709

Olivia S. Choe ochoe@milbank.com Joshua B. Sterling jsterling@milbank.com MILBANK LLP 1101 New York Avenue, NW Washington, D.C. 20005 Telephone: (202) 835-7500 Facsimile: (202) 263-7586

Grant R. Mainland gmainland@milbank.com MILBANK LLP 55 Hudson Yards New York, NY 10001 Telephone: (212) 530-5000 Facsimile: (212) 530-5219

Attorneys for Defendants Kalshi Inc. and KalshiEX LLC