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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **SOUTHERN DIVISION**

20 JANE DOE on behalf of herself and all
21 other similarly situated,
22 Plaintiffs,

23 v.

24 MINDGEEK USA INCORPORATED,
25 MINDGEEK S.A.R.L., MG
26 FREESITES LTD (D/B/A PORNHUB),
27 MG FREESITES II LTD, MG
28 CONTENT RT LIMITED, AND 9219-
1568 QUEBEC INC. (D/B/A
MINDGEEK),
Defendants.

CASE NO. 8:21-CV-00338-CJC-ADS

Judicial Officer: Cormac J. Carney
Courtroom: 9B

**NOTICE OF MOTION BY
DEFENDANTS TO DISMISS THE
COMPLAINT WITH PREJUDICE**

Date: August 2, 2021

Time: 1:30 p.m.

Courtroom: 9B

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on August 2, 2021 at 1:30 P.M., or as soon
3
4 thereafter as this matter may be heard, Defendants MindGeek USA Incorporated,
5 MindGeek S.A.R.L., MG Freesites Ltd, MG Freesites II Ltd, MG Content RT Ltd,
6 and 9219-1568 Quebec Inc. (collectively, “Defendants”) will and hereby
7
8 respectfully move for an order dismissing Plaintiff’s Complaint with prejudice
9 pursuant to Federal Rule of Civil Procedure 12(b)(6).

10 This Motion will be heard in the Courtroom of the Honorable Cormac J.
11 Carney for the United States District Court in the Central District of California. The
12 Court is located at the Ronald Reagan Federal Building and United States
13 Courthouse, Courtroom 9B, 411 West Fourth Street, Santa Ana, CA 92701-4516.
14 This Motion is based on this Notice of Motion, the attached Memorandum of Points
15 and Authorities in Support of Defendants’ Motion To Dismiss the Complaint with
16 Prejudice, the pleadings on file herein and upon such other matters as may be
17 presented to the Court at the time of the hearing.
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1 This Motion is made following conference of counsel pursuant to Local Rule
2 7-3 which took place on June 23, 2021.
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4 DATED: JUNE 30, 2021

 /S/ BENJAMIN M. SADUN

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