IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RATES TECHNOLOGY INC.,	)	
	)	
Plaintiff,	)	
	)	C. A. No. 07-441-JJF
v.	)	
	)	
PRIMUS TELECOMMUNICATIONS INC. and PRIMUS TELECOMMUNICATIONS GROUP INC.,	)	
	)	
Defendants.	)	

DEFENDANTS PRIMUS TELECOMMUNICATIONS, INC. AND PRIMUS TELECOMMUNICATIONS GROUP INC.'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, STAY PLAINTIFF RATES TECHNOLOGY INC.'S COMPLAINT

Defendants Primus Telecommunications, Inc. and Primus Telecommunications Group, Incorporated ("Primus") move to dismiss or, in the alternative, stay Plaintiff Rates Technology Inc.'s Complaint. The grounds for this motion are fully set forth in Primus' Opening Brief in Support of its Motion to Dismiss or, in the Alternative, Stay Plaintiff Rates Technology Inc.'s Complaint and the supporting Declaration of James M. Dowd, filed contemporaneously herewith.

Accordingly, Primus respectfully requests the Court enter an Order substantially similar to the proposed order attached hereto.



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Dated: September 19, 2007

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2007, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

BY HAND

Mary Matterer
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Plaintiff,	)	
	)	C. A. No. 07-441-JJF
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	)	
PRIMUS TELECOMMUNICATIONS INC. and PRIMUS TELECOMMUNICATIONS GROUP INC.,	)	
	)	
Defendants.	)	

[PROPOSED] ORDER

Upon consideration of Defendants Primus Telecommunications, Inc. and Primus Telecommunications Group Inc.'s Motion to Dismiss or, in the Alternative, Stay Plaintiff Rates Technology Inc.'s Complaint,

IT IS HEREBY ORDERED this _____ day of _____, 2007, that the Motion is **GRANTED.**

IT IS FURTHER ORDERED that Plaintiff's complaint is dismissed, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

_____
The Honorable Joseph J. Farnan, Jr.
United States District Judge