

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GETTY IMAGES (US), INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 23-135 (JLH)
)	
STABILITY AI, LTD. STABILITY AI,)	
INC., and STABILITY AI US SERVICES)	
CORPORATION)	
)	
Defendants.)	

DEFENDANTS' RENEWED MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(7), Defendants respectfully move to dismiss Plaintiff's Second Amended Complaint (D.I. 42) for lack of personal jurisdiction over a necessary and indispensable party.

The grounds for this motion are fully set forth in Defendants' Opening Brief and the Declaration of Peter O'Donoghue filed herewith. A proposed order is attached.

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July 29, 2024

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CORPORATION)	
)	
Defendants.)	

[PROPOSED] ORDER GRANTING MOTION TO DISMISS

The Court, having reviewed and considered Defendants’ Renewed Motion to Dismiss and the responsive filings, finds that the Motion should be granted.

Accordingly, IT IS HEREBY ORDERED that the Motion is GRANTED and Plaintiff’s claims in its Second Amended Complaint (D.I. 42) are DISMISSED.

SO ORDERED this _____ day of _____, 2024.

The Honorable Jennifer L. Hall
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 29, 2024, upon the following in the manner indicated:

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