

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

JILL HINES, ET AL.,

*Plaintiffs,*

v.

ALEX STAMOS, ET AL.,

*Defendants.*

Case No. 3:23-cv-571

Chief Judge Terry A. Doughty

Magistrate Judge Kayla D. McClusky

**DEFENDANTS' JOINT MOTION TO DISMISS**

For the reasons stated in the accompanying memorandum, Defendants Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, the Leland Stanford Junior University, the Stanford Internet Observatory (SIO), Kate Starbird, Graphika, Camille François, the Atlantic Council, the Atlantic Counsel's Digital Forensic Research Lab (DFRLab), and Graham Brookie (together, "Defendants") move to dismiss the Complaint in its entirety under Rules 12(b)(1), (2), (3), and (6) of the Federal Rules of Civil Procedure because the Court lacks personal and subject-matter jurisdiction, venue is improper, and the Complaint fails to state a claim upon which relief may be granted.

Defendants have moved to compel arbitration or, alternatively, to transfer venue under 28 U.S.C. § 1404. The Court should decide that motion before addressing any merits-based ground for dismissal in the Joint Motion to Dismiss, *i.e.*, before deciding whether the complaint states a claim upon which relief may be granted under Rule 12(b)(6).

August 14, 2023

/s/ Camala E. Capodice

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Respectfully submitted,

/s/ James Brown

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*/s/ Jon K. Guice*

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*Counsel for Kate Starbird*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 14th day of August, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will provide notice of electronic filing to the attorneys for all parties.

*/s/ James A. Brown*

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James A. Brown