UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES, :

Plaintiff,

v. : Case No. 24-cv-01457 (JPO)

NOTICE OF MOTION

SEAN COMBS, JUSTIN DIOR COMBS, CUBA GOODING, JR., LUCIAN CHARLES GRAINGE, KRISTINA KHORRAM, LOVE RECORDS, MOTOWN RECORDS, UNIVERSAL MUSIC GROUP, COMBS GLOBAL ENTERPRISES, JOHN and JANE DOES 1-10; and ABC CORPORATIONS 1-10.

.

Defendants. :

PLEASE TAKE NOTICE that upon this Notice of Motion, dated as of August 26, 2024, and the accompanying memorandum of law, dated August 26, 2024, and upon all prior proceedings had in herein, Defendants Sean Combs ("Mr. Combs"), Love Records, Inc. 1 ("Love Records") and CEOpCo, LLC (t/a Combs Global) f/k/a Combs Enterprises, LLC² ("Combs Global") (collectively, the "Combs Defendants"), will move this Court, in accordance with Fed. R. Civ. P. 12(c), before the Honorable J. Paul Oetken at the Thurgood Marshall United States Courthouse, Courtroom 706, 40 Foley Square, New York, New York 10007, for an order dismissing Plaintiff's Second Amended Complaint with prejudice (ECF No. 38).

Answering declarations and memorandum of law, if any, shall be filed on or before Monday, September 09, 2024, and any reply declarations and memorandum of law shall be filed on or before Monday, September 16, 2024, unless otherwise extended by the Court.

Named incorrectly in the Summons and Complaint as Love Records.

Named incorrectly in the Summons and Complaint as Combs Global Enterprises.

Dated: New York, New York August 26, 2024

SHER TREMONTE LLP

/s/ Erica A. Wolff

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