

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SCARLETT PAVLOVICH,

Plaintiff,

v.

Case No. 25-CV-00078

NEIL GAIMAN and
AMANDA PALMER,

Defendants.

MOTION TO DISMISS

Defendant Neil Gaiman hereby moves the Court to dismiss the complaint filed in this case. Specifically, Gaiman moves to dismiss (1) the entire complaint because the doctrine of *forum non conveniens* dictates that New Zealand is the proper forum to adjudicate this case; (2) the Trafficking Victims Protection Act (“TVPA”) claims (causes of action one through four) pursuant to Fed. R. Civ. P.12(b)(6) because they cannot be applied extraterritorially; (3) the entire complaint because the doctrine of prudential exhaustion requires plaintiff to exhaust the remedies available in New Zealand before bringing claims within the United States; (4) the entire complaint because international comity dictates that United States courts must abstain from adjudicating acts committed within the jurisdiction of a foreign nation; and (5) the common law tort claims (causes of action five through nine) pursuant to 28 U.S.C. § 1367 because if the TVPA claims are dismissed for any reason, the Court will lack jurisdiction over the tort claims. In support of this motion,

Gaiman submits the supporting brief that is being filed contemporaneously herewith.

Dated: March 4, 2025.

Respectfully submitted,

s/Stephen E. Kravit

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