

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SCOTT STEPHENS,	: Case No. 1:15-cv-02217-ENV-LB
	: :
Plaintiff,	: DEFENDANTS' NOTICE
	: OF MOTION TO
-against-	: <u>DISMISS COMPLAINT</u>
	: :
TRUMP ORGANIZATION LLC,	: <u>Date of Service:</u> August 3, 2015
DONALD J. TRUMP, ALAN GARTEN,	: :
and MICHAEL COHEN,	: :
	: :
Defendants.	: :
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PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Complaint, the accompanying Declaration of Matthew R. Maron, dated August 3, 2015, and all accompanying exhibits, and all prior pleadings and proceedings herein, defendants Trump Organization LLC, Donald J. Trump, Alan Garten and Michael Cohen will respectfully move this Court before the Honorable Eric N. Vitaliano, U.S.D.J., at the United States District Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, Courtroom 4C, at such time and place as the Court may direct, for an order pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing all claims with prejudice for failure to state a claim upon which relief can be granted.

Pursuant to the Scheduling Order of Magistrate Judge Lois Bloom, dated July 2, 2015, defendants shall serve its motion on plaintiff by August 3, 2015; plaintiff shall serve his opposition on defendants by September 4, 2015; and, defendants shall serve its reply, if any, on plaintiff by September 16, 2015.

Defendants request that oral argument be heard on this motion.

Dated: New York, New York
August 3, 2015

THE TRUMP ORGANIZATION

By: /s/ Matthew R. Maron

Matthew R. Maron

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Attorney for Defendants