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**FILED**  
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U.S. DISTRICT COURT E.D.N.Y.  
★ APR 13 2022 ★  
**BROOKLYN OFFICE**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

\_\_\_\_\_)  
SARAH EDMONDSON, *et al.* )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
Keith Raniere, *et al.* )  
 )  
Defendants. )  
\_\_\_\_\_)

Civil Action NO. 20-CV-485

**DEFENDANTS MOTION TO DISMISS COMPLAINT**

Pursuant to Rule 8, 9(b), and 12 (b)(6) of the Federal Rules of Civil Procedure, Defendant hereby respectfully requests that the court hereby dismiss all claims in the complaint for failure to state a complaint for relief, failure to make a short and plain statement of the claim showing that the pleader is entitled to relief, and failure to state with particularity the circumstances constituting fraud or mistake they are alleging. The reasons in support of Defendants' Motion are set forth in the attached Memorandum of Points and Authorities.