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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18
19 UNLOCKD MEDIA, INC. LIQUIDATION
TRUST, by and through its duly appointed
20 trustee, Peter S. Kaufman,

21 Plaintiff,

22 v.

23 GOOGLE LLC, GOOGLE IRELAND LTD.,
GOOGLE COMMERCE LTD., and GOOGLE
24 ASIA PACIFIC PTE. LTD.,

25 Defendants.

Case No. 4:21-cv-07250-HSG

**DEFENDANTS GOOGLE LLC, GOOGLE
IRELAND LTD., GOOGLE COMMERCE LTD.,
AND GOOGLE ASIA PACIFIC PTE. LTD.’S
NOTICE OF MOTION AND MOTION TO
DISMISS PLAINTIFF’S FIRST AMENDED
COMPLAINT**

Date: July 14, 2022
Time: 2:00 p.m.
Dept: Courtroom 2, 4th Floor
Judge: Haywood S. Gilliam, Jr.

Trial Date: Not Yet Set

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NOTICE OF MOTION AND MOTION TO DISMISS

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on July 14, 2022 at 2:00 p.m., or as soon thereafter as this Motion to Dismiss (“Motion”) may be heard in the above-titled court, located at Courtroom 2, 4th Floor, 1301 Clay Street, Oakland, CA 94612, Defendants Google LLC, Google Ireland Ltd., Google Commerce Ltd., and Google Asia Pacific Pte. Ltd. (“Defendants” or “Google”) will move to dismiss the First Amended Complaint (ECF No. 54-3, the “Complaint” or “FAC”) of Unlockd Media, Inc. Liquidation Trust (“Plaintiff” or “Unlockd”).

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Google requests that this Court dismiss, with prejudice, each of Plaintiff’s claims for failure to state a claim upon which relief may be granted. Google’s Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Deepti Bansal, the Declaration of Sara Plummer, and all pleadings and papers on file in this matter, and upon such matters as may be presented to the Court at the time of hearing or otherwise.

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