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Mondelēz Global LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AVI KLAMMER, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

MONDELĒZ GLOBAL LLC,

Defendant.

Case No. 4:22-cv-2046-JSW

The Honorable Jeffrey S. White

**NOTICE OF MOTION AND MOTION TO
DISMISS FIRST AMENDED CLASS ACTION
COMPLAINT; MEMORANDUM OF POINTS
& AUTHORITIES**

Hearing Date: September 30, 2022

Hearing Time: 9:00 a.m.

Courtroom: Remote (Zoom)

1 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, on September 30, 2022 at 9:00 a.m., or as soon thereafter as the
3 Court is available, Defendant Mondelēz Global LLC (“MDLZ”) will appear before the Honorable Jeffrey
4 S. White via the Zoom videoconference platform and will, and hereby does, move to dismiss Plaintiff Avi
5 Klammer’s First Amended Class Action Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6),
6 and each claim asserted therein, because it fails to state a plausible claim on which relief can be granted.

7 MDLZ’s motion to dismiss is based on this Notice of Motion and Motion, the following
8 Memorandum of Points and Authorities, any additional briefing on this subject (including MDLZ’s reply
9 brief), and the evidence and arguments that will be presented to the Court at the hearing on this matter.

10
11 DATED: July 26, 2022

JENNER & BLOCK LLP

12 By: /s/ Dean N. Panos
13 Dean N. Panos

14 Attorneys for Defendant
15 Mondelēz Global LLC
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