

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

MYA BATTON, AARON BOLTON,  
MICHAEL BRACE, DO YEON KIM, ANNA  
JAMES, JAMES MULLIS, THEODORE  
BISBICOS, and DANIEL PARSONS,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF  
REALTORS, REALOGY HOLDINGS CORP.,  
HOMESERVICES OF AMERICA, INC., BHH  
AFFILIATES, LLC, HSF AFFILIATES, LLC,  
THE LONG & FOSTER COMPANIES, INC.,  
RE/MAX, LLC, and KELLER WILLIAMS  
REALTY, INC.,

Defendants.

Case No. 1:21-cv-00430

Honorable Andrea R. Wood

**MEMORANDUM IN SUPPORT OF MOTION TO DISMISS  
AMENDED COMPLAINT PURSUANT TO RULES 12(b)(1) and 12(b)(6)**

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