

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

SCOTT BISHINS and DARSHAN
HASTHANTRA, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

CLEANSARK, INC., ZACHARY
BRADFORD, and S. MATTHEW SCHULTZ,

Defendants.

Case No. 1:21-cv-00511-LAP

**DEFENDANTS' MEMORANDUM OF LAW
IN SUPPORT OF MOTION TO DISMISS**

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