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14   **IN THE UNITED STATES DISTRICT COURT**

15   **CENTRAL DISTRICT OF CALIFORNIA**

16   **WESTERN DIVISION**

17

18 NOMADIX, INC.,   Case No.: 2:19-cv-04980 AB (FFMx)

19   Plaintiff,

20   v.   **NOTICE OF MOTION AND
                                        MOTION TO DISMISS FOR
21   IMPROPER CLAIM SPLITTING**

   GUEST-TEK INTERACTIVE
22 ENTERTAINMENT LTD.,   HEARING DATE: Dec. 6, 2019
                                                        10:00 a.m.
23   Defendant.   Courtroom 7B

24

25   Honorable André Birotte Jr.

26

27

28

NOTICE OF MOTION & MOTION TO DISMISS FOR IMPROPER CLAIM SPLITTING;

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1   **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**
2   **COUNSEL OF RECORD HEREIN:**
3   **PLEASE TAKE NOTICE** that on Friday, December 6, 2019 at 10:00 a.m.,
4   or as soon thereafter as this matter may be heard, in Courtroom 7B of the above-
5   captioned court, located at 350 W. First Street, Los Angeles, California 90012,
6   before the Honorable André Birotte Jr., Defendant/Counter-Claimant Guest-Tek
7   Interactive Entertainment Ltd. ("Guest-Tek") will, and hereby does, move to dismiss
8   the Complaint under Fed. R. Civ. P. 12(c) on grounds that the Complaint constitutes
9   impermissible claim splitting.
10   This motion is supported by this Notice of Motion and Motion, the
11   accompanying Memorandum of Points and Authorities, the accompanying Request
12   for Judicial Notice, the accompanying Declaration of Kevin M. Bovard; all
13   pleadings on file in this action as well as the related matter, *Nomadix Inc. v. Guest-*
14   *Tek Interactive Entertainment Ltd.*, 2:16-cv-08033, and upon such other matters and
15   argument as may be presented to the Court at the time of the hearing.
16   This Motion is made following the pre-filing conference of counsel, which
17   took place on November 4, 2019.
18
19   Dated: November 8, 2019   Respectfully submitted,
20   BAKER & HOSTETLER LLP
21   By: */s/ Kevin M. Bovard*
22   Attorneys for Defendant
23   GUEST-TEK INTERACTIVE
                                      ENTERTAINMENT LTD.
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