

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KAREN HEPP,

Plaintiff,

v.

**FACEBOOK, INC.; IMGUR, INC.,
REDDIT, INC., GIPHY, INC.; WGCZ
S.R.O., and DOES 1-10,**

Defendants.

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: **19-CV-4034**
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**MOTION OF DEFENDANT IMGUR, INC. TO DISMISS
THE FIRST AMENDED COMPLAINT**

Defendant Imgur, Inc. (“Imgur”) moves, pursuant to Federal Rule of Civil Procedure 12(b)(2), to dismiss all claims against it because this Court lacks jurisdiction over Imgur. Imgur also moves, pursuant to Fed.R.Civ.P. 12(b)(6), to dismiss all claims against it because the purported claims are not actionable under Pennsylvania state law, and are pre-empted by Section 230(c) of the Communications Decency Act, which immunizes Imgur from all claims raised in this lawsuit. The grounds for this Motion are set forth in the accompanying Memorandum of Law, and the Declaration of Alan Schaaf, both of which are incorporated by reference.

Respectfully submitted,

Dated: March 2, 2020

/s/ Michael LiPuma

Michael LiPuma, Esq.
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Attorney for Defendant Imgur, Inc.

CERTIFICATE OF SERVICE

I certify that on March 2, 2020, I caused a copy of the foregoing document, together with all supporting papers, to be served by ECF upon all counsel of record.

/s Michael LiPuma
Michael LiPuma, Esq.