

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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GEORGE OUZOUNIAN, P/K/A MADDOX, and  
JANE DOE,

Plaintiffs,

v.

Index No.: 656779/2017

DAX HERRERA P/K/A DICK MASTERSON,  
FOUNDATION DIGITAL, LLC, GREG BOSER,  
LOREN BAKER, CMGRP, INC., D/B/A WEBER  
SHANDWICK, JOSHUA KAUFMAN, ASTERIOS  
KOKKINOS, TREVOR BIRT, PATREON, INC., and  
JORDAN COPE

Defendants.  
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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, submitted on behalf of Defendants Patreon, Inc. and Jordan Cope, dated January 12, 2018, the Affidavit of Colin Sullivan, sworn to on January 12, 2018, with the exhibits annexed hereto, the Affidavit of Jordan Cope, sworn to on January 12, 2018, and the Affirmation of Kristin E. Olson, with the exhibit annexed hereto, Defendants Patreon, Inc. and Jordan Cope, through their undersigned counsel, will move this Court at the Courthouse, Room 130, located at 60 Centre Street, New York, New York, on February 9, 2018, at 9:30 a.m. or as soon thereafter as they may be heard, for an Order, pursuant to C.P.L.R. §§ 3211(a)(8), (a)(1), and (a)(8), dismissing Plaintiffs' Complaint.

PLEASE TAKE FURTHER NOTICE, that pursuant to C.P.L.R. § 2214(b), the Plaintiffs' answering papers, if any, shall be served upon the undersigned no later than seven days before the return date of this motion.

Dated: January 12, 2018  
New York, NY

Respectfully submitted,

/s/ L. Reid Skibell  
L. Reid Skibell  
Kristin E. Olson  
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*Attorneys for Defendants Patreon, Inc. and  
Jordan Cope*