

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNIVERSAL SECURE REGISTRY, LLC,

Plaintiff,

vs.

APPLE INC., VISA INC., and VISA U.S.A., INC.,

Defendants.

Civil Action No. 17-585-VAC-MPT

DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendants Apple Inc., Visa Inc., and Visa U.S.A. Inc. ("Defendants") respectfully move to dismiss this case with prejudice. The grounds for this motion are fully set forth in the Defendants' Opening Brief in support of this motion, filed contemporaneously herewith, and upon the papers, records, and pleadings on file with the Court.

/s/ Jason J. Rawnsley

Fredrick L. Cottrell, III (#2555)
Jason J. Rawnsley (#5379)
RICHARDS LAYTON, & FINGER, P.A.
920 North King Street
Wilmington, DE 19801
(302) 651-7700
cottrell@rlf.com
rawnsley@rlf.com

Attorneys for Defendant Apple Inc.

/s/ Bindu Palapura

David E. Moore (#3983)
Bindu Palapura (#5370)
POTTER ANDERSON CORROON LLP
1313 North Market Street 6th Floor
Wilmington, DE 19801
(302) 984-6147
dmoore@potteranderson.com
bpalapura@potteranderson.com

*Attorneys for Defendants Visa Inc. and
Visa U.S.A., Inc.*

OF COUNSEL:

Mark D. Selwyn
WILMER CUTLER PICKERING
HALE & DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
(650) 8580-6000

Monica Grewal
WILMER CUTLER PICKERING
HALE & DORR LLP
60 State Street
Boston, MA 02109
(202) 663-6000

Derek A. Gosma
WILMER CUTLER PICKERING
HALE & DORR LLP
350 South Grand Avenue, Suite 2100
Los Angeles, CA 90071
(213) 443-5300

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OF COUNSEL:

James Yoon
Jamie Y. Otto
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto CA 94304
(650) 320-4726