

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

UNIVERSITY OF MASSACHUSETTS	)	
MEDICAL SCHOOL and CARMEL	)	
LABORATORIES, LLC,	)	
	)	
Plaintiffs,	)	C.A. No. 17-868-JFB-SRF
	)	
v.	)	
	)	
L'ORÉAL S.A. and L'ORÉAL USA, INC.,	)	
	)	
Defendants.	)	

**DEFENDANT L'ORÉAL USA, INC.'S MOTION TO DISMISS  
THE FIRST AMENDED COMPLAINT**

Defendant L'Oréal USA, Inc. ("L'Oréal USA"), by and through its undersigned counsel, hereby moves to dismiss all claims pled in the First Amended Complaint (D.I. 13) with prejudice, pursuant to Fed. R. Civ. P. 8(a)(2) and 12(b)(6). The grounds for this motion are set forth fully in L'Oréal USA's Opening Brief filed herewith.

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