

**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 S.A.'s
MOTION TO DISMISS FIRST AMENDED COMPLAINT**

Defendant L'Oréal S.A. ("L'Oréal S.A."), by and through its undersigned counsel, hereby moves to dismiss the First Amended Complaint (D.I. 13) pursuant to Federal Rule of Civil Procedure ("Rule") Rule 12(b)(2), for lack of personal jurisdiction, and Rule 12(b)(6), for failure to state a claim upon which relief can be granted (the "Motion"). The grounds for this Motion are set forth fully in L'Oréal S.A.'s Opening Brief filed contemporaneously herewith, as well as the Declaration of Roy Rabinowitz.

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