

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BROADSIGN INTERNATIONAL, LLC,

Plaintiff,

v.

T-REX PROPERTY, AB,

Defendant.

Civil Action No.: 1:16-cv-04586 (LTS)

**T-REX PROPERTY, AB'S NOTICE OF MOTION TO DISMISS
BROADSIGN INTERNATIONAL, LLC'S AMENDED COMPLAINT (D.I. 10)
FOR DECLARATORY JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 12(b)(1)**

Defendant T-Rex Property, AB ("T-Rex") respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 12(b)(1), for an Order granting its Motion to Dismiss BroadSign International, LLC's ("BroadSign") Amended Complaint (D.I. 10) against T-Rex Property, AB for lack of subject matter jurisdiction. The grounds for this motion are more fully set forth in T-Rex's Memorandum of Law, filed contemporaneously herewith.

Pursuant to Your Honor's Individual Practice Rule A.2.b.(i).(A), T-Rex attempted to engage BroadSign in informal efforts to resolve the issues raised in this motion, including by sending a letter to BroadSign outlining T-Rex's legal and factual positions and requesting a telephone conference to discuss the issue. However, BroadSign did not respond to T-Rex's letter.

/s/Caryn L. Cross

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*Attorneys for Defendant
T-Rex Property, AB*

Dated: December 14, 2016

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2016, I electronically filed the foregoing filing with the Clerk of Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ Caryn L. Cross _____

Caryn L. Cross