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Attorneys for Defendant
MICHAEL PLANET

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

COURTHOUSE NEWS SERVICE,
 	
       Plaintiff,
 	
    v.
 	
MICHAEL PLANET, IN HIS OFFICIAL CAPACITY AS COURT EXECUTIVE OFFICER/CLERK OF THE VENTURA COUNTY SUPERIOR COURT,
 	
       Defendant.
	Case No. CV11-08083 R (MANx)
	
	Assigned for all purposes to
	Hon. Manuel L. Real
	
	DEFENDANT'S NOTICE OF MOTION TO DISMISS AMENDED COMPLAINT
	
	Date: August 4, 2014
	Time: 10:00 a.m.
	Judge: Hon. Manuel L. Real

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 4, 2014 at 10:00 a.m., or as soon thereafter as the matter may be heard in Courtroom 8 of the above-entitled court, located at 312 N. Spring St., Los Angeles, California 90012, defendant Michael D. Planet, in his official capacity as Executive Officer and Clerk of the Superior Court of California, County of Ventura, will and hereby does move the Court to dismiss the Amended Complaint on file in this action because it fails to state a claim for relief for violation of the First Amendment to the United States Constitution.

The motion is based on this Notice of Motion, the concurrently filed Memorandum of Points and Authorities, all other pleadings and papers filed herein, and any additional argument the Court may consider at the hearing on this motion.

Dated: June 24, 2014.

Respectfully submitted,

JONES DAY

By: /s/ Robert A. Naeve

Robert A. Naeve

Attorneys for Defendant
MICHAEL PLANET