

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

REPUBLIC OF PERU,)	
)	
Plaintiff,)	
)	Case No. 1:08-cv-02109 (HHK)
v.)	
)	
YALE UNIVERSITY,)	
)	
Defendant.)	

**DEFENDANT YALE UNIVERSITY'S
MOTION TO DISMISS THE AMENDED COMPLAINT
FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE**

Pursuant to Federal Rules of Civil Procedure 12(b)(2) and (3), for the reasons set forth in the accompanying statement of points and authorities, defendant Yale University moves to dismiss the Amended Complaint in its entirety on the grounds that the Court lacks personal jurisdiction over defendant and that the District of Columbia is not the proper venue for adjudication of claims between a Peruvian plaintiff and a Connecticut defendant over property that has been located in Connecticut for nearly a century.

Respectfully submitted,

Date: May 21, 2009

/s/ Jonathan M. Freiman
Jonathan M. Freiman (D.C. # Bar D00322)
Jeffrey R. Babbin (D.C. Bar # 384557)
Tahlia Townsend
WIGGIN AND DANA LLP
One Century Tower
P.O. Box 1832
New Haven, CT 06508-1832
(203) 498-4400
(203) 782-2889 (fax)
jfreiman@wiggins.com
jbabbin@wiggins.com
ttownsend@wiggins.com

R. Scott Greathead (*pro hac vice*)
WIGGIN AND DANA LLP
450 Lexington Avenue
Suite 3800
New York, NY 10017
(212) 490-1700
(212) 490-0536 (fax)
sgreathead@wiggins.com

Attorneys for Yale University