

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

HEATHER MARIE KOTIS  
and RACHEL CHRISTINE MILL,  
individually,

Plaintiffs,

CASE NO. 8:07-cv-00447-T30-EA

v.

DESLIN HOTELS, INC.;  
IRENE L. DEVLIN;  
DENNIS B., DEVLIN;  
GOLDRUSH DISC JOCKEYS, INC.;  
DAVID L. BARTON;  
BV & BK PRODUCTIONS, LLLP;  
CHAD W. CIANI;  
MRA HOLDINGS, LLC;  
AMX PRODUCTIONS, LLC d/b/a AMX Video, a/k/a GM Video, a/k/a George Martin Video, a/k/a  
Action Matrix, a/k/a Aztec Media Co.;  
MANTRA FILMS, INC., d/b/a Girls Gone Wild;  
JOSEPH R. FRANCIS;  
SVOTHI, INC., d/b/a PPVNetworks and nakedontv.com; and  
JUCCO HOLDINGS, INC., d/b/a drunkspringbreak.com;

Defendants

---

**DEFENDANTS CHAD CIANI'S AND BV & BK PRODUCTIONS, LLLP'S  
DISPOSITIVE MOTION TO DISMISS**

Defendants, CHAD CIANI and BV & BK PRODUCTIONS, LLLP, by and through the undersigned counsel and pursuant to F.R.C.P. 12(b), hereby moves this court to dismiss Plaintiffs' Complaint. Defendants' arguments in support of this motion are set forth in the Memorandum of Law filed simultaneously with this motion.

Respectfully submitted,

/s/ Camille Godwin

Todd Foster, Esq.  
Florida Bar No.: 0325198  
Camille Godwin  
Florida Bar No.: 0974323  
Michael Rubinstein, Esq.  
Florida Bar No.: 0032143  
Cohen, Jayson & Foster, P.A.  
201 E. Kennedy Boulevard, Suite 1000  
Tampa, FL 33602  
(813) 225-1655 (Telephone)  
(813) 225-1921 (Facsimile)  
*Attorneys for BV & BK Productions, LLLP*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on **May 21, 2007**, the foregoing was served upon the following by email:

<p>Stanford R. Solomon Mark Stephen Howard Thomas E. DeBerg The Solomon Tropp Law Group, P.A. 1881 W. Kennedy Blvd. Tampa, FL 33606-1606 <a href="mailto:tdeberg@solomonlaw.com">tdeberg@solomonlaw.com</a> <a href="mailto:mhoward@solomonlaw.com">mhoward@solomonlaw.com</a> <a href="mailto:ssolomon@solomonlaw.com">ssolomon@solomonlaw.com</a> P: 813-225-1818 F: 813-225-1050 Counsel for Kotis and Mill</p>	<p>Richard S. Shankman Litigation Concepts, L.C. 2536 NW 53<sup>rd</sup> Street Boca Raton, FL 33496-2204 <a href="mailto:shankmantancredo@aol.com">shankmantancredo@aol.com</a> P: 561-997-2771 F: Unknown Co-Counsel for Kotis and Mill</p>
--	---

/s/ Camille Godwin  
Camille Godwin