

In the United States District Court
for the Northern District of Illinois
Eastern Division

GRAND PIER CENTER LLC and)
 AMERICAN INTERNATIONAL)
 SPECIALTY LINES INSURANCE CO.)
 as subrogee of Grand Pier Center LLC,)
)
 Plaintiffs/Counterclaim Defendants,)
)
 v.)
)
 RIVER EAST LLC and)
 CHICAGO DOCK AND CANAL TRUST and)
 CHICAGO DOCK AND CANAL COMPANY,)
)
 Defendants,)
)
 TRONOX LLC,)
)
 Defendant/Counterclaim Plaintiff.)

No. 03 C 7767

consolidated with
No. 05 C 1156

Judge Filip

TRONOX LLC’S MOTION FOR JUDGMENT ON THE PLEADINGS

Pursuant to Rule 12(c) of the Federal Rules of Civil Procedure,
Defendant/Counterclaim Plaintiff Tronox LLC (“Tronox”) hereby moves for judgment on the
pleadings with respect to all claims asserted by Plaintiffs/Counterclaim Defendants Grand Pier
Center LLC (“Grand Pier”) and American International Specialty Lines Insurance Co.
(“American International”), as subrogee of Grand Pier (collectively, the “plaintiffs”).

The grounds for Tronox’s motion are fully set forth in the accompanying
Memorandum In Support of Tronox LLC’s Motion for Judgment on the Pleadings.

Dated: March 9, 2006

Respectfully submitted,

Tronox, LLC

By: s/Michael P. Connelly
One of its attorneys

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