## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS – EASTERN DIVISION

MEANITH HUON,	)
Plaintiff,	)
v.	) Case No. 11-cv-03054
ABOVETHELAW.COM, et al.,	) Judge Aspen
Defendants.	)  Magistrate Judge Gilbert

## SUMMARY OF THE MEMORANDUM IN SUPPORT OF ABOVE THE LAW DEFENDANTS' MOTION TO DISMISS PURSUANT TO RULE 12(b)(6) AND ITS EXHIBITS

The ATL Defendants $^1$  are filing this summary of their memorandum in support of their Rule 12(b)(6) motion to dismiss (

because he does not allege special damages. Finally, many of the statements that Plaintiff identifies in Paragraphs 24-25 of his Second Amended Complaint are clearly not actionable because they plainly do not refer to Plaintiff, would not tend to harm his reputation, or simply do not appear in the Post at all.

Other causes of action. Plaintiff also alleges claims of intentional infliction of emotional distress, conspiracy, and cyberstalking. The emotional distress claim fails for the same reasons as the defamation and false light claims and also because Plaintiff does not allege

## Exhibit B