

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RUDE MUSIC, INC.,)	
)	Case No. 1:12-cv-00640 (MFK)
Plaintiff,)	
)	Judge Kennelly
v.)	Magistrate Judge Finnegan
)	
NEWT 2012, INC., <i>et al.</i> ,)	
Defendants)	

**AMERICAN CONSERVATIVE UNION'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

The American Conservative Union respectfully moves, pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, to dismiss the Complaint against it for lack of personal jurisdiction. Plaintiff has not alleged facts sufficient to invoke the Illinois long-arm statute or to satisfy due process. The Declaration of Gregg Keller, submitted herewith, confirms that such facts do not exist. The grounds for dismissal are detailed in the Memorandum of Law supporting this Motion.

Dated: March 7, 2012

Respectfully submitted,

AMERICAN CONSERVATIVE UNION

By: /s/ Thomas W. Kirby
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CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2012, I electronically filed the foregoing **American Conservative Union's Motion to Dismiss for Lack of Personal Jurisdiction** via this Court's CM/ECF system, and counsel of record have been served as follows:

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