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Attorneys for Defendant Gagosian Gallery, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAFFLANE HOLDINGS LTD., and
ROBERT WYLDE,

NOTICE OF MOTION

Plaintiffs,

No. 11-CIV-1679
(DLC)

-against-

GAGOSIAN GALLERY, INC.,

Defendant.
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PLEASE TAKE NOTICE THAT, defendant Gagosian Gallery, Inc. will move this court for an Order, pursuant to Fed. R. Civ. P. 12(b)(6), dismissing plaintiff's complaint as it fails to "state a claim upon which relief can be granted," and pursuant to Fed. R. Civ. P. 12(a), striking the allegations made by plaintiff in paragraphs 32, 76-80 of the Complaint as scandalous.

Dated: New York, New York
May 11, 2010

Respectfully submitted,

WITHERS BERGMAN LLP

By: 

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