

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DEMOCRATIC NATIONAL COMMITTEE,

Plaintiff,

v.

THE RUSSIAN FEDERATION *et. al.*,

Defendants.

Case No. 18-CV-03501

**NOTICE OF MOTION TO  
DISMISS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of his Motion to Dismiss the Second Amended Complaint, dated January 17, 2019, Defendant Jared Kushner hereby moves this Court, before the Honorable J. John G. Koeltl, United States District Judge, 500 Pearl St., Courtroom 14A, New York, NY 10007-1312, for an order dismissing the Second Amended Complaint for failure to state a claim upon which relief can be granted pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that Kushner joins in, relies upon, and incorporates herein by reference, each and every argument, insofar as it applies to him, made by each and every other defendant named in the Second Amended Complaint.

Dated: March 4, 2019

Respectfully submitted,

/s/ Abbe David Lowell

Abbe David Lowell (NY Bar No. AL2981)  
ADLowell@winston.com  
Christopher D. Man (*pro hac*)  
CMan@winston.com  
Kyllan J. Gilmore  
KGilmore@winston.com  
WINSTON & STRAWN LLP

1700 K Street, NW  
Washington, DC 20006  
T: 1-202-282-5000  
F: 1-202-282-5100

*Counsel for Jared Kushner*

TO:  
Michael Eisenkraft  
Cohen Milstein Sellers & Toll PLLC  
88 Pine St. # 14  
New York, NY 10005  
(212) 838-7797  
meisenkraft@cohenmilstein.com

Joseph M. Sellers  
Geoffrey A. Graber  
Julia A. Horwitz  
Alison S. Deich  
Eric S. Berelovich  
Cohen Milstein Sellers & Toll PLLC  
1100 New York Ave. NW • Fifth Floor Washington, DC 20005  
(202) 408-4600  
jsellers@cohenmilstein.com  
ggraber@cohenmilstein.com  
jhorwitz@cohenmilstein.com  
adeich@cohenmilstein.com  
eberelovich@cohenmilstein.com

*Attorneys for Plaintiff*  
**DEMOCRATIC NATIONAL COMMITTEE**