

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEMOCRATIC NATIONAL COMMITTEE

Plaintiff,

v.

Case No. 1:18-cv-03501-JGK

THE RUSSIAN FEDERATION, et. al.,

Defendants.

**DEFENDANT ROGER STONE'S NOTICE OF MOTION TO DISMISS
SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, Defendant Roger Stone respectfully moves this Court to dismiss the RICO, D.C.-law and Virginia-law and related conspiracy claims under Federal Rules of Civil Procedure 12(b)(1); and, dismiss all claims for failure to state a claim upon which relief can be granted under Federal Rules of Civil Procedure 12(b)(6). Upon the accompanying Motion to Dismiss, Defendant will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 14A, New York, NY 10007, before the Honorable John G. Koeltl, United States District Judge, for an Order dismissing Plaintiff's complaint (ECF No. 217) with prejudice.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, shall be filed and served in accordance with the Scheduling Order dated October 1, 2018 (ECF No. 181).

Dated: March 4th , 2019

Respectfully submitted,

/s/ Robert Buschel

Grant J. Smith
(admitted pro hac vice)
StrategySmith, P.A.
401 East Las Olas Boulevard
Suite 130-120
Fort Lauderdale, FL 33301
(954) 328-9064
gsmith@strategysmith.com

Robert C. Buschel
Counsel of Record
(admitted pro hac vice)
BUSCHEL GIBBONS, P.A.
ONE FINANCIAL PLAZA – SUITE 1300
100 S.E. THIRD AVENUE
FORT LAUDERDALE, FL 33394
(954) 530-5301
BUSCHEL@BGLAW-PA.COM

Counsel for Roger Stone

CERTIFICATE OF SERVICE

I certify that on March 4, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered parties.

/s/ Robert Buschel

Robert C. Buschel

Counsel for Roger Stone