

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHARLES HARRIS, as an individual, and)
UNIQUE PRODUCTS AND SERVICES, a)
Pennsylvania Corporation,)

Plaintiffs,)

v.)

No.: 2:10-cv-05655-JD

Judge: Jan E. DuBois

OPRAH WINFREY, as an individual, and)
THE OPRAH WINFREY SHOW d/b/a)
HARPO PRODUCTIONS INC., an Illinois)
Corporation,)

Defendants.)

DEFENDANTS’ MOTION TO DISMISS

Defendants Oprah Winfrey, as an individual, and The Oprah Winfrey Show d/b/a Harpo Productions Inc. (hereafter “Harpo”) move this Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for an order dismissing all claims against them with prejudice. The bases for this Motion are fully set forth in the accompanying Memorandum of Law, which is incorporated by reference as if set forth in full herein.

**OPRAH WINFREY, as an individual, and The
OPRAH WINFREY SHOW d/b/a HARPO
PRODUCTIONS INC.**

By: /s/ William T. Hangle

Charles L. Babcock
Nancy W. Hamilton
JACKSON WALKER L.L.P.
1401 McKinney, Suite 1900
Houston, TX 77010
(713) 752-4200

William T. Hangley
HANGLEY ARONCHICK SEGAL & PUDLIN
One Logan Square, 27th Floor
Philadelphia, PA 19103
Phone: 215-496-7001
Email: wth@hangley.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Defendants' Motion to Dismiss and accompanying Memorandum of Law was sent to all counsel of record or parties via electronic filing through the Court's Electronic Filing System and/or via electronic mail this 29th day of November 2010, and by United States Mail, first class postage prepaid to:

James Lee, Esquire
1500 Market Street
12th Floor/East Tower
Philadelphia, PA 19102
(312) 328-9511

/s/ William T. Hangle
William T. Hangle