

contacts with the forum state for the exercise of personal jurisdiction to be proper. Supporting authorities and the grounds for granting Defendant Ted Baer's Motion to Dismiss are more fully set forth in the accompanying Memorandum filed herewith.

DATED this 16th day of May, 2011.

MORGAN, MINNOCK, RICE & JAMES, L.C.

/s/ Dennis R. James
Dennis R. James
Brian H. Hess
Counsel for Defendant Ted Baer

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May, 2011, I electronically filed a true and correct copy of the foregoing **MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT FOR LACK OF JURISDICTION** with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following:

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