

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

DENNIS G. LOMAX,)
)
 Plaintiff,)
)
 v.)
)
 WIKIMEDIA FOUNDATION, INC.; and)
 JOHN DOES 1-9,)
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 Defendants.)
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Case No. 3:19-cv-30025-KAR

**DEFENDANT WIKIMEDIA FOUNDATION, INC.'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Wikimedia Foundation, Inc. (“Wikimedia”) hereby moves to dismiss Plaintiff’s Complaint with prejudice as against Wikimedia for the reasons set forth in the accompanying Memorandum of Law in Support of Wikimedia’s Motion to Dismiss, Declaration, and Exhibits, filed contemporaneously.

Dated: May 20, 2019

Respectfully submitted,

/s/ Christopher M. Morrison

Christopher M. Morrison (BBO #651335)
Erik N. Doughty (BBO #691487)
JONES DAY
100 High Street, 21st Floor
Boston, MA 02110
Telephone: (617) 960-3939
Facsimile: (617) 449-6999
cmorrison@jonesday.com
edoughty@jonesday.com

*Attorneys for Defendant Wikimedia
Foundation, Inc.*

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Christopher M. Morrison, hereby certify that, pursuant to Local Rule 7.1(a)(2), on May 2, 2019, counsel for Defendant Wikimedia Foundation, Inc. conferred with *pro se* Plaintiff and attempted in good faith to resolve or narrow the issues.

Dated: May 20, 2019
Boston, Massachusetts

/s/ Christopher M. Morrison
Christopher M. Morrison

CERTIFICATE OF SERVICE

I, Christopher M. Morrison, hereby certify that I caused a true copy of the foregoing Defendant Wikimedia Foundation, Inc.'s Motion to Dismiss Plaintiff's Complaint to be served through the ECF system on all parties registered to receive ECF notices in this case, and to Plaintiff via first class mail, postage prepaid.

Dated: May 20, 2019
Boston, Massachusetts

/s/ Christopher M. Morrison
Christopher M. Morrison