

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JAMES R. ZAZZALI, as Trustee for the)
DBSI Private Actions Trust,)
)
Plaintiff,)
)
v.)
)
ALEXANDER PARTNERS, LLC, et. al.)
)
Defendants.)
)

C.A. No. 12-00828 GMS

[REDACTED]
[REDACTED] **MOTION
TO DISMISS AMENDED COMPLAINT IN ITS ENTIRETY FOR FAILURE
TO SUFFICIENTLY STATE CLAIMS FOR RELIEF**

Defendants [REDACTED]

[REDACTED] (“Representative Defendants”), by and through their undersigned counsel, moves the Court pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and D. Del. L.R. 7.1.2, to dismiss the Amended Complaint in its entirety against the Representative Defendants on the grounds that the Amended Complaint fails to state a claim against upon which relief can be granted.

The grounds for this motion are set out in detail in the Opening Brief in Support of [REDACTED]

[REDACTED]

Motion to Dismiss Amended Complaint for Failure to Sufficiently State a Claim Upon Which Relief Can be Granted, filed concurrently with this motion. For the reasons set forth therein, the Representative Defendants respectfully request that the Court dismiss all counts of the Amended



Complaint as to them with prejudice and grant such other relief as the Court deems just and appropriate.

[REDACTED]

Dated: March 14, 2014

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

-and-

EVANS & KOB, PC

Brett G. Evans
180 E. Main Street, Suite 104
Tustin, CA 92780
Telephone: (657) 210-2114
Facsimile: (949) 954-8186
brett@eklawpc.com

Attorneys for [REDACTED]
[REDACTED]
[REDACTED]

