

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CHASE BANK USA, N.A.)
)
 Plaintiff,) CIVIL ACTION NO. 1:08cv00121-JJF
)
 v.)
)
 HESS KENNEDY CHARTERED, LLC.,)
 et al.)
)
 Defendants.)

**NOTICE OF MOTION
TO DISMISS AND INCORPORATED MEMORANDUM OF LAW FOR LACK OF
PERSONAL JURISDICTION, IMPROPER VENUE
AND/OR IN THE ALTERNATIVE FORUM NON-CONVENIENS**

TO: Ms. Beth Moskow-Schnoll, Esq.
Ballard Spahr Andrews & Ingersoll, LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103

PLEASE TAKE NOTICE that the within “Motion to Dismiss and Incorporated Memorandum of Law for Lack of Personal Jurisdiction, Improper Venue and/or in the Alternative Forum Non-Conveniencs” shall be presented to the Court on a date and at a time convenient to the Court.

Cohen Seglias Pallas Greenhall and Furman, P.C

/S/ Robert K. Beste, Jr. (ID #154)

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