

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PELICAN EQUITY, LLC,

Plaintiff,

-against-

ROBERT V. BRAZELL, STEPHEN L.
NORRIS, TALOS PARTNERS, LLC,
RAMA RAMACHANDRAN, DARL
McBRIDE, and BRYAN CAVE LLP,

Defendants.

09 Civ. 5927 (NRB)

NOTICE OF MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the attached First Amended Complaint and the accompanying Memorandum of Law, Defendant Bryan Cave LLP (“Bryan Cave”) by and through its undersigned counsel will move, at a date, time and location to be determined by the Court, for an order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the First Amended Complaint, filed on September 18, 2009, with prejudice.

PLEASE TAKE FURTHER NOTICE that, pursuant to the stipulated briefing schedule agreed to between counsel for Bryan Cave and counsel for Plaintiff, as set forth in Bryan Cave’s letter to the Court dated September 24, 2009, and ordered by the Court, opposing papers shall be filed by Plaintiff on November 9, 2009 and Bryan Cave’s reply shall be filed on November 18, 2009.

PLEASE TAKE FURTHER NOTICE that Defendant Bryan Cave requests oral argument on the present motion at a date, time and location to be established by the Court.

Dated: October 13, 2009
New York, NY

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Moses Silverman

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