

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

KATHRYN NARCISI

v.

TURTLEBOY DIGITAL MARKETING,
LLC D/B/A TURTLEBOYSports.COM

C.A. No. 2019-cv-00329-JJM-PAS

MOTION TO DISMISS

Defendant Worcester Digital Marketing LLC, formerly known as Turtleboy Digital Marketing LLC, by its attorney, hereby moves pursuant to Rule 12(b) of the Federal Rules of Civil Procedure to dismiss the complaint for (a) lack of personal jurisdiction and (b) insufficient service of process. In support of the motion, Defendant submits the Declaration of Aidan Kearney and a supporting memorandum of law.

Defendant,
By its attorney,

/s/ Lynette Labinger
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Cooperating counsel,
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF RHODE ISLAND

CERTIFICATION

I hereby certify that on June 24, 2019, a true copy of this document with supporting memorandum of law and Declaration of A. Kearney was delivered electronically using the CM/ECF system to all counsel of record and a copy provided by mail to Kathryn Narcisi, 349 Tomaquag Road, Hopkinton, RI 02804.

/s/ Lynette Labinger