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CHURCH OF SCIENTOLOGY
12 INTERNATIONAL

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
15

16 CLAIRE HEADLEY

17 Plaintiff,

18 vs.

19 CHURCH OF SCIENTOLOGY
INTERNATIONAL, a corporate entity;
20 RELIGIOUS TECHNOLOGY CENTER, a
corporate entity; and DOES 1 through 20,

21 Defendants.
22
23

Case No. CV09-3987 MMM (FFMx)

**DEFENDANT CHURCH OF
SCIENTOLOGY
INTERNATIONAL'S NOTICE OF
MOTION AND MOTION TO
STRIKE PORTIONS OF
PLAINTIFF'S SECOND
AMENDED COMPLAINT**

[Rule 12(f), Fed. R. Civ. P.]

(Served concurrently with Motion to
Dismiss)

Date: July 27, 2009

Time: 10:00 a.m.

Ctrm: Hon. Margaret M. Morrow

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NOTICE OF MOTION AND MOTION TO DISMISS

TO PLAINTIFF AND HIS COUNSEL OF RECORD:

NOTICE IS HEREBY GIVEN that on July 27, 2009, at 10:00 a.m., or as soon thereafter as counsel may be heard by the above-entitled Court, located at 255 E. Temple Street, Los Angeles, California 90012, defendant Church of Scientology International will and hereby does move the Court for an order, pursuant to Fed. R. Civ. P. 12(f), striking portions of Plaintiff’s Second Amended Complaint (“SAC”), as identified in the accompanying Memorandum of Points and Authorities because those portions of the SAC are immaterial, redundant, impertinent or scandalous and contain considerable legal argument and conclusions that make it impossible for Defendant to answer large portions of the SAC.

Defendant’s counsel conducted the conference of counsel required by Local Rule 7-3 on June 9, 2009, with Plaintiff’s counsel, Barry Van Sickle. Mr. Van Sickle did not agree to strike any portion of the SAC.

This Motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the SAC, all pleadings and papers on file in this action, and upon such other matters as may be presented to the Court at or before the time of the hearing.

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DATED: June 10, 2009

MOXON & KOBRIN
KENDRICK L. MOXON

-and-

PROSKAUER ROSE LLP
ANTHONY J ONCIDI
HAROLD M. BRODY
G. SAMUEL CLEAVER

By: 

HAROLD M. BRODY

Attorneys for Defendant,
Church of Scientology International