

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

VINCENT FORRAS, <i>et al.</i>,)	
)	
Plaintiffs)	
)	Case No. 1:12-cv-00282-RWR
v.)	Judge Richard W. Roberts
)	
IMAM FEISAL ABDUL RAUF, <i>et al.</i>)	
)	
Defendants)	

**DEFENDANT ADAM LEITMAN BAILEY’S MOTION TO DISMISS
AND FOR ATTORNEYS’ FEES**

COMES NOW Defendant Adam Leitman Bailey by and through the undersigned counsel, pursuant to F.R.Civ.P. 12(b)(1), (2), (3) & (6), F.R.Civ.P. 56, and the D.C. Anti-SLAPP Act, D.C. Code § 16-5501 *et seq.*, 28 U.S.C. § 1927 and moves this court to dismiss the claims of Plaintiffs’ as set forth in the Complaint filed herein on February 21, 2012 and to award costs and attorneys’ fees. The Plaintiffs’ fail to establish diversity of citizenship to support subject matter jurisdiction and there is no basis for personal jurisdiction over Defendant Bailey under the District’s long-arm statute. In addition, the claims are time-barred, fail to state a claim and are unsupported by the evidence. This lawsuit is barred by the doctrines of *res judicata* and collateral estoppel and it is part of a long history of vexatious and improper litigation by the Plaintiffs. For these reasons, and under the D.C. Anti-SLAPP Act, 28 U.S.C. § 1927 and the inherent power of this Court to prevent abuse of the judicial process, Defendants are entitled to full attorneys’ fees and costs. A separate Memorandum of Points and authorities is being filed herewith.

Respectfully Submitted,

DEFENDANT ADAM LEITMAN BAILEY
By Counsel

CROWLEY, HOGE & FEIN, P.C.

By: /s/ Christopher G. Hoge
Christopher G. Hoge #203257

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served via electronic filing this 13th day of May, 2013 to:

Larry Klayman
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/s/ Christopher G. Hoge
Counsel

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ORDER

UPON CONSIDERATION of Defendant Adam Leitman Bailey’s Motion to Dismiss and for Attorneys’ Fees, any opposition thereto, and good cause having been shown, it is this _____, day of _____, 2013 hereby

ORDERED that the Motion is GRANTED; and it is further

ORDERED that all claims stated by any and all parties therein against Defendant Adam Leitman Bailey are hereby DISMISSED WITH PREJUDICE; and it is further

ORDERED that Defendant Adam Leitman Bailey is awarded attorney’s fees in the amount of _____ and costs in the amount of _____, such sums to be paid by the Plaintiffs.

JUDGE

Copies to:

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