

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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YULIA TYMOSHENKO,

Plaintiff,

vs.

Civil Action No.: 11-2794 (AJN)

DMYTRO FIRTASH, et al.

Defendants.

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**MOTION TO DISMISS OF DEFENDANT
VULCAN PROPERTIES INC.**

Pursuant to Federal Rule of Civil Procedure 12(b), defendant Vulcan Properties Inc. (“Vulcan”) hereby moves to dismiss the Amended Complaint of plaintiff Yulia Tymoshenko (“Plaintiff”). For the reasons set forth in the accompanying Memorandum of Law and those fully set forth in the motion to dismiss filed by defendants Paul Manafort, Brad Zackson, CMZ Ventures, LLC, the Dynamic Group and Barbara Ann Holdings LLC (which are adopted and joined by Vulcan), Vulcan respectfully requests that the Court grant this motion and dismiss with prejudice all claims in the Amended Complaint as against Vulcan.

Dated: April 27, 2012

Respectfully submitted,

GOLDBERG WEPRIN FINKEL
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