

WHEREFORE, for the reasons stated above and those set forth more fully in Culper's Memorandum of Law in Support of this Motion to Dismiss, Culper respectfully requests that this Court enter an Order granting Culper's Motion, dismissing all claims against Christian Matthew Lamarco and Culper Research with prejudice in their entirety, and providing such other and further relief as this Court deems necessary and appropriate under the circumstances.

Respectfully submitted,

COZEN O'CONNOR

BY: /s/ Michael de Leeuw

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CERTIFICATE OF SERVICE

I, Michael de Leeuw, hereby certify that I electronically submitted the foregoing Defendants' Motion to Dismiss Plaintiffs' Complaint Pursuant to Rule 12(b)(6) with the Clerk of Court for the United States District Court for the Western District of Pennsylvania, using the electronic filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the following individuals who, by rule, have consented to accept the Notice as service of this document by electronic means:

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