

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PERRY BEENEY, <i>et al.</i> ,)	
)	C.A. No. 1:22-cv-00518-CFC
<i>Plaintiffs,</i>)	
)	
v.)	
)	
FCA US LLC, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

**DEFENDANT FCA US LLC’S MOTION TO DISMISS
PLAINTIFFS’ FIRST AMENDED CLASS ACTION COMPLAINT**

Defendant FCA US LLC hereby moves this Court to dismiss Plaintiffs’ First Amended Class Action Complaint pursuant to Fed. R. Civ. P. 12(b)(6). The grounds for the motion are set forth in the supporting brief, which is submitted herewith.

Dated: December 5, 2022

Respectfully submitted,

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MELLOTT, LLC**

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CERTIFICATE OF SERVICE

The undersigned certifies that on December 5, 2022, a copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Patrick M. Brannigan _____