

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION**

ELIZABETH STEINES, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 3:22-cv-03099

Hon. Stephen P. McGlynn

**DEFENDANT APPLE INC.'S
MOTION TO DISMISS THE COMPLAINT**

Defendant Apple Inc. ("Apple"), by its undersigned counsel and pursuant to Fed. R. Civ. P. 12(b)(6), hereby moves to dismiss all counts of the Complaint with prejudice. In support of this motion, Apple incorporates its memorandum of law filed herewith.

Wherefore, Apple respectfully requests that the Court grant this motion, dismiss the complaint and each claim asserted therein with prejudice, and grant other relief as the Court deems just and appropriate.

Dated: March 29, 2023

Respectfully submitted,

Apple Inc.

By: /s/ Raj N. Shah
One of its attorneys

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**Admission forthcoming

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on March 29, 2023, I caused a true and correct copy of this document to be served by the Court's ECF system on all CM/ECF participants.

By: /s/ Raj N. Shah_____

Raj N. Shah

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