IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA BEAUFORT DIVISION

RICHARD ALEXANDER)
MURDAUGH, JR.,)
Plaintiff,)))
v.)
) Civil Action No.: 9:24-cv-04914-RMG
BLACKFIN, INC., WARNER BROS.)
DISCOVERY, INC., WARNER	
MEDIA ENTERTAINMENT PAGES,) MOTION TO DISMISS OF
INC., CAMPFIRE STUDIOS INC.,	CAMPFIRE STUDIOS INC.
THE CINEMART LLC, NETFLIX,	
INC., GANNETT CO., INC. and	
MICHAEL M. DEWITT, JR.,)
)
Defendants.)

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Campfire Studios Inc. ("Campfire")¹ respectfully moves this court for an Order dismissing Plaintiff's Complaint. The basis for this Motion is that the Complaint fails to state a claim upon which relief can be granted.

This Motion is supported by applicable law, Campfire's Memorandum of Law filed simultaneously herewith, and any additional supporting memoranda that may be submitted by Campfire at or before any ruling on this Motion.

which is wholly owned by Campfire Film & TV, LLC. Campfire reserves all rights and waives none by filing this Motion. Campfire also does not waive a personal jurisdiction defense.

¹ As explained in the Amended Answer to Local Rule 26.01 Interrogatories [ECF 44], Campfire is the improper party because the company that produced the Campfire Documentary is HCM, LLC,

WHEREFORE, Defendant Campfire Studios Inc. respectfully requests that the Court enter an Order Dismissing Plaintiff's Complaint.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

s/ MERRITT G. ABNEY

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Attorneys for Defendants Blackfin, Inc., Warner Bros. Discovery, Inc., Warner Media Entertainment Pages, Inc. and Campfire Studios Inc.

Charleston, South Carolina October 16, 2024