

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

RICHARD ALEXANDER )  
MURDAUGH, JR., )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
BLACKFIN, INC., WARNER BROS. )  
DISCOVERY, INC., WARNER )  
MEDIA ENTERTAINMENT PAGES, )  
INC., CAMPFIRE STUDIOS INC., )  
THE CINEMART LLC, NETFLIX, )  
INC., GANNETT CO., INC. and )  
MICHAEL M. DEWITT, JR., )  
 )  
Defendants. )  
 )

Civil Action No.: 9:24-cv-04914-RMG

**MOTION TO DISMISS OF**  
**WARNER BROS. DISCOVERY, INC.**  
**AND WARNER MEDIA**  
**ENTERTAINMENT PAGES, INC.**

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Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Warner Bros. Discovery, Inc. and Warner Media Entertainment Pages, Inc. (jointly, the “Warner Entities”)<sup>1</sup> respectfully move this court for an Order dismissing the 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, the memoranda of law filed simultaneously herewith by Defendants Blackfin, Inc. [EFC No. 48-1] and Campfire Studios Inc. [EFC No.49-1] in

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<sup>1</sup> As explained in the Amended Answer to Local Rule 26.01 Interrogatories [ECF 44], neither of the Warner Entities was properly named. Based on the allegations of the Complaint (none of which the Warner Entities concede), Plaintiff should have identified WarnerMedia Direct, LLC, Discovery Communications, LLC, and Discovery Digital Ventures, LLC as defendants instead of WBD and Warner Media. Notwithstanding that WarnerMedia Direct, LLC is the only relevant Warner Entity related to the Campfire Documentary, all of the Warner Entities join this Motion, but reserve all rights and waive none by so doing. The Warner Entities also do not waive a personal jurisdiction defense.

support of their respective motions to dismiss, in which the Warner Defendants join in full, and any additional supporting memoranda that may be submitted by the Warner Defendants at or before any ruling on this Motion.

WHEREFORE, the Warner Entities respectfully request that the Court enter an Order Dismissing Plaintiff's Complaint.

Respectfully submitted,

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s/ MERRITT G. ABNEY

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Campfire Studios Inc.*

Charleston, South Carolina  
October 16, 2024

**COURTESY OF  
LUNA SHARK MEDIA**