

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

PROJECT VOTE/VOTING FOR)
AMERICA, INC.,)
)
Plaintiff/Counterclaim Defendant,)
)
)
vs.)
)
ASHAWNITA MONCRIEF,)
)
Defendant/Counterclaim Plaintiff,)
)
JOHN DOE,)
)
Defendant,)
)
vs.)
)
ASSOCIATION OF COMMUNITY)
ORGANIZATIONS FOR REFORM NOW, INC.,)
)
Counterclaim Defendant.)
)

Case No. 09-cv-01109-RWR

**DEFENDANT ASHAWNITA MONCRIEF’S MOTION TO DISMISS
COUNTS I-III, VI-VII & IX-XI**

Defendant Ashawnita (“Anita”) MonCrief hereby moves to dismiss Counts I, II, III, VI, VII, IX, X, and XI of Plaintiff Project Vote’s Complaint. Fed. R. Civ. P. 12(b)(6). As set out in the attached memorandum in support of this motion, Project Vote’s alleged causes of action based upon federal trademark law, trespass to chattels, civil conspiracy, and misrepresentation do not state a claim upon which relief can be granted and fail as a matter of law. Defendant respectfully requests that this Court dismiss these claims with prejudice. Oral argument on this motion is requested. A proposed order is attached. LCVR 7(c).

Respectfully submitted,

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