

**IN UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Baltimore Division**

**GLENDORA MANAGO, et al.,**

*Plaintiffs,*

v.

**CANE BAY PARTNERS VI, LLLP, et al.,**

*Defendants.*

Case No. 1:20-cv-00945-LKG

**DEFENDANTS’ MOTION TO DISMISS THE OUT-OF-STATE PLAINTIFFS’ CLAIMS  
FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE AND  
REQUEST FOR HEARING**

Defendants Cane Bay Partners VI, LLLP, David Johnson, Kirk Chewning, Richard Mayer, Karen Rabbithead, David Blacksmith, Wesley Scott Wilson,<sup>1</sup> Mark Fox, Cory Spotted Bear, Sherry Turner-Lone Fight, Mervin Packineau, V. Judy Brugh, Fred Fox, and Monica Mayer (collectively, “Defendants”), by counsel, hereby move to dismiss Plaintiffs’ First Amended Class Action Complaint as to the claims brought by Plaintiffs Karen Peterson, Diana Costa, Colleen Hunter, Sharon Davis, Leslie Turner, Camilla Vernon, and LaShaunya Morris (collectively, the “Out-of-State Plaintiffs”) under Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3), and 28 U.S.C. § 1406(a). The reasons and grounds supporting this Motion are more specifically set forth in the accompanying Memorandum in Support, which is incorporated by reference herein.

WHEREFORE, Defendants respectfully move this Court to enter an order granting this Motion to Dismiss the Out-Of-State Plaintiffs’ Claims for Lack of Personal Jurisdiction and

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<sup>1</sup> Defendant Wesley Scott Wilson’s last name was misspelled as “Eilson” in the First Amended Class Action Complaint.

Improper Venue, and all claims therein, with prejudice, and for such other and further relief as the Court deems appropriate.

Dated: February 4, 2022

Respectfully submitted,

By: /s/ Ashley Vinson Crawford

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Monica Mayer*

### **REQUEST FOR HEARING**

Defendants Cane Bay Partners VI, LLLP, David Johnson, Kirk Chewning, Richard Mayer, Karen Rabbithead, David Blacksmith, Wesley Scott Wilson, Mark Fox, Cory Spotted Bear, Sherry Turner-Lone Fight, Mervin Packineau, V. Judy Brugh, Fred Fox, and Monica Mayer respectfully request a hearing on their Motion to Dismiss the Out-Of-State Plaintiffs' Claims for Lack of Personal Jurisdiction and Improper Venue.

/s/ Ashley Vinson Crawford