

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LOTES CO., LTD.)

Plaintiff,)

v.)

HON HAI PRECISION INDUSTRY CO. LTD.;)
FOXCONN INTERNATIONAL HOLDINGS LTD.;)
FOXCONN INTERNATIONAL, INC.; FOXCONN)
ELECTRONICS, INC.; and FOXCONN (KUNSHAN))
COMPUTER CONNECTOR CO., LTD.)

Defendants.)
_____)

12-cv-7465 (SAS)

ECF Case

NOTICE OF MOTION

**ORAL ARGUMENT
REQUESTED**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendant Foxconn International Holdings Ltd., by and through its attorneys, Morgan, Lewis & Bockius LLP, will move this Court before the Honorable Shira A. Scheindlin, United States District Judge, at a date and time to be assigned by the Court, for an Order dismissing the First Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(6) in its entirety with prejudice, and for other and further relief as this Court may deem just and proper.

Dated: April 15, 2013
New York, New York

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Thomas J. Lang

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CERTIFICATE OF SERVICE

I, the undersigned counsel for Defendant Foxconn International Holdings Ltd. do hereby certify that I have on this 15th day of April, 2013, served the within document by causing a copy thereof to be sent electronically to the registered participants in this case, if any, as identified on the Notice of Electronic Filing (NEF) and paper copies mailed, first class mail, postage prepaid to any non-registered participants in this case.

/s/ Thomas J. Lang

Thomas J. Lang