

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

Eric Greathouse, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

Capital Plus Financial, LLC and
Crossroads Systems, Inc.,

Defendants.

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Case No. 4:21–cv–1243–BRW

**Defendants Capital Plus Financial, LLC’s
and Crossroads Systems, Inc.’s Motion to Dismiss**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendants Capital Plus Financial, LLC and Crossroads Systems, Inc. (“Defendants”) respectfully move to dismiss the Complaint filed by Plaintiff Eric Greathouse at Docket Entry No. 1 (the “Complaint”) for lack of personal jurisdiction. In the alternative, and subject to and without waiver of Defendants’ challenge to personal jurisdiction, Defendants respectfully move to dismiss the Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) for lack of subject-matter jurisdiction (Article III standing) and for failure to state a claim on which relief may be granted. The grounds for the relief requested in this motion are set forth in the Defendants supporting brief, which accompanies this Motion.

Respectfully submitted this February 25th, 2022.

Karen P. Freeman (Ark. Bar No. 2009094)
MITCHELL, WILLIAMS, SELIG,
GATES & WOODYARD, P.L.L.C.
4206 South J.B. Hunt Drive, Suite 200
Rogers, Arkansas 72758
Tel.: (479) 464-5650
Fax: (479) 464-5680
Kfreeman@mwlaw.com

Graham Talley (Ark. Bar No. 2015159)
MITCHELL, WILLIAMS, SELIG,
GATES & WOODYARD, P.L.L.C.
425 West Capitol Avenue, Suite 1800
Little Rock, Arkansas 72201
Tel.: (501) 688-8800
Fax: (501) 688-8807
Gtalley@mwlaw.com

Katherine G. Treistman (*pro hac vice*)
Andrew D. Bergman (*pro hac vice*)
ARNOLD & PORTER KAYE SCHOLER LLP
700 Louisiana Street, Suite 4000
Houston, Texas 77002-2755
Tel.: (713) 576-2400
Fax: (713) 576-2499
Katherine.Treistman@arnoldporter.com
Andrew.Bergman@arnoldporter.com

Eric N. Whitney (*pro hac vice*)
ARNOLD & PORTER KAYE SCHOLER LLP
250 West 55th Street
New York, New York 10019-9710
Tel.: (212) 836-8000
Fax: (212) 836-8689
Eric.Whitney@arnoldporter.com

*Attorneys for Defendants Capital Plus
Financial, LLC and Crossroads Systems, Inc.*