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

Eric Greathouse, Ernesto Covarrubias, Tiffany Sumrall, and Barbara Myles, individually and on behalf of all others similarly situated, Plaintiff, v. **Capital Plus Financial, LLC** and **Crossroads Systems, Inc.**, Defendants.	§ § § § § § § § § § § §	Case No. 4:21–cv–1243–BRW

Defendants Capital Plus Financial, LLC's and Crossroads Systems, Inc.'s Motion to Dismiss Plaintiffs' Amended Class Action Complaint

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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 Amended Complaint filed by Plaintiffs Eric Greathouse, Ernesto Covarrubias, Tiffany Sumrall, and Barbara Myles at Docket Entry No. 31 (the "Amended 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 Amended 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 is set forth in the Defendants supporting brief, which accompanies this Motion.

Respectfully submitted on April 29, 2022.

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