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11 Attorneys for CHRISTINE DIGNAM, Personal
 12 Representative of the Estate of JUSTIN CARROLL DIGNAM
 13 Claimant/Respondent

14 UNITED STATES DISTRICT COURT

15 CENTRAL DISTRICT OF CALIFORNIA
 16 IN ADMIRALTY

17 In the Matter of the Complaint of) Case No. CV 19-7693 PA (MRWx)
 18 TRUTH AQUATICS, INC. and)
 19 GLEN RICHARD FRITZLER and) **CLAIMANT/RESPONDENT**
 20 DANA JEANNE FRITZLER,) **CHRISTINE DIGNAM'S NOTICE**
 21 Individually and as Trustees of the) **OF MOTION AND MOTION TO**
 22 Fritzler Family Trust DTD 7/27/92 as) **STRIKE AFFIRMATIVE**
 23 owners and/or owners *pro hac vice* of) **DEFENSES**
 24 the dive vessel CONCEPTION,)
 25 Official Number 638133, for)
 26 Exoneration from or Limitation of) Date: Monday, January 27, 2020
 27 Liability) Time: 1:30 p.m.

28 Before the Hon. Percy Anderson

Supporting documents:
 Memorandum
 Declaration of John R. Hillsman
 Proposed Order

McGuinn, Hillsman & Palefsky
 535 Pacific Avenue
 San Francisco, CA 94133
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1 TO PLAINTIFFS TRUTH AQUATICS, INC., GLEN RICHARD FRITZLER
2 and DANA JEANNE FRITZLER, AND TO THEIR COUNSEL OF RECORD:

3 PLEASE TAKE NOTICE that on Monday, January 27, 2020, at 1:30 p.m., or
4 as soon thereafter as the matter can be heard, in Courtroom 9A of the Honorable
5 Percy Anderson, located on the 9th Floor of the First Street Courthouse, 350 West
6 1st Street, Los Angeles, California 90012, Claimant/Respondent JUSTINE
7 DIGNAM will move the Court, under Fed.R.Civ.P. 12(f), for an order striking the
8 Tenth, Fourteenth, Sixteenth, Eighteenth, and Twenty-Third Affirmative Defenses
9 from Plaintiffs’ Answer to Claimant/Respondent JUSTINE DIGNAM’S
10 Counterclaim herein.
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13 This motion will be based upon this Notice, the accompanying Memorandum
14 of Points and Authorities, and records and pleadings in this action.
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17 This motion is made following a “conference of counsel pursuant to Local
18 Rule 7-3” which took place on Monday, December 9, 2019.
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21 Dated: December 17, 2019.

McGUINN, HILLSMAN & PALEFSKY

22 By: /s/ JOHN R. HILLSMAN _____

23 JOHN R. HILLSMAN

24 Attorneys for Claimant/Respondent
25 JUSTINE DIGNAM
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27
28

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