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

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
IN ADMIRALTY

In the Matter of the Complaint of)	Case No. CV 19-7693 PA (MRWx)
TRUTH AQUATICS, INC. and)	
GLEN RICHARD FRITZLER and)	CLAIMANT/RESPONDENT
DANA JEANNE FRITZLER,)	CHRISTINE DIGNAM'S NOTICE
Individually and as Trustees of the)	OF MOTION AND MOTION TO
Fritzler Family Trust DTD 7/27/92 as)	STRIKE AFFIRMATIVE
owners and/or owners <i>pro hac vice</i> of)	DEFENSES
the dive vessel CONCEPTION,)	Fed.R.Civ.P. 12(f)
Official Number 638133, for)	
Exoneration from or Limitation of)	Date: Monday, January 27, 2020
Liability)	Time: 1:30 p.m.

Before the Hon. Percy Anderson

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

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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16 This motion is made following a "conference of counsel pursuant to Local
17 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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