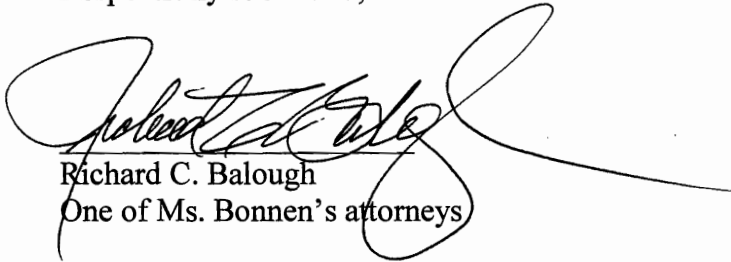


- The “tweet” lacks precise meaning and does not constitute defamation *per se*.
 - The Complaint fails to allege any special damages as required if Plaintiff’s claim is to be considered defamation *per quod*.
3. Defendant’s attorneys have filed on this date a Memorandum of Law in support of this Motion and incorporate its contents by reference herein.

Defendant requests that the court enter an order that strikes the Complaint and dismisses it with prejudice.

Respectfully submitted,



Richard C. Balough
One of Ms. Bonnen’s attorneys

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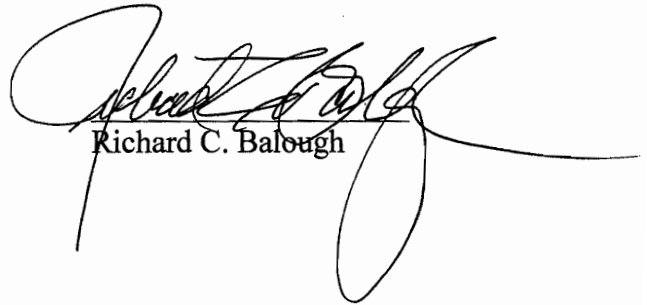
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CERTIFICATE OF SERVICE

I, Richard C. Balough, do hereby certify that a true and correct copy of the foregoing Motion to Dismiss the Verified Complaint has been served upon:

Bret A. Rappaport
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847.597.2151
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by electronic mail on this 10th day of November, 2009.



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