

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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YULIA TYMOSHENKO,

Plaintiff,

vs.

Civil Action No.: 11-2794 (AJN)

DMYTRO FIRTASH, et al.

Defendants.

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**MOTION TO DISMISS OF DEFENDANT  
VULCAN PROPERTIES INC.**

Pursuant to Federal Rule of Civil Procedure 12(b), defendant Vulcan Properties Inc. (“Vulcan”) hereby moves to dismiss the Amended Complaint of plaintiff Yulia Tymoshenko (“Plaintiff”). For the reasons set forth in the accompanying Memorandum of Law and those fully set forth in the motion to dismiss filed by defendants Paul Manafort, Brad Zackson, CMZ Ventures, LLC, the Dynamic Group and Barbara Ann Holdings LLC (which are adopted and joined by Vulcan), Vulcan respectfully requests that the Court grant this motion and dismiss with prejudice all claims in the Amended Complaint as against Vulcan.

Dated: April 27, 2012

Respectfully submitted,

GOLDBERG WEPRIN FINKEL  
GOLDSTEIN, LLP

By:   
By: Matthew Hearle (MH-3596)

1501 Broadway – 22<sup>nd</sup> Floor  
New York, New York 10036  
Phone: (212) 221-5700  
Fax: (212) 301-6532  
Email: [mhearle@gwfglaw.com](mailto:mhearle@gwfglaw.com)

*Attorneys for Defendant  
Vulcan Properties Inc.*

TO:

Kenneth Foard McCallion, Esq.  
McCallion & Associates LLP  
Attorneys for Plaintiff  
100 Park Avenue  
16<sup>th</sup> Floor  
New York, New York 10017  
(646) 366-0880