

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KARMEL DAVIS AND ASSOCIATES,
ATTORNEYS-AT-LAW, LLC, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

HARTFORD CASUALTY INSURANCE
COMPANY,

Defendant.

Case No.: 1:20-cv-02181-WMR

**DEFENDANT HARTFORD CASUALTY INSURANCE
COMPANY'S MOTION TO DISMISS AMENDED
NATIONWIDE CLASS ACTION CLAIMS**

Pursuant to Federal Rule of Civil Procedure 12(b)(1) and (b)(2), Defendant Hartford Casualty Insurance Company hereby moves this Court for an order dismissing all nationwide class action claims against it with prejudice. As explained in greater detail in the accompanying brief, the nationwide class action claims of Plaintiff Karmel Davis and Associates, Attorneys-at-Law, LLC should be dismissed for lack of standing and lack of personal jurisdiction.

Dated: October 16, 2020

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Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

In accordance with LR 7.1(D), NDGa, I certify that the foregoing document is prepared in 14-point Times New Roman font. *See* LR 5.1(C), NDGa.

/s/ Christopher C. Frost

Christopher C. Frost

CERTIFICATE OF SERVICE

This document is being filed with the Court electronically via the ECF system. The requirements of service and proof of service of this document are satisfied by the automatic notice of filing sent by the CM/ECF software in accordance with the Local Rules of this Court on this 16th day of October 2020.

/s/ Christopher C. Frost

Christopher C. Frost