

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AMERICA’S KIDS, LLC, individually and)	
on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	Case No. 1:20-cv-03520
v.)	
)	Hon. Virginia M. Kendall
ZURICH AMERICAN INSURANCE)	
COMPANY,)	
)	
Defendant.)	

**MOTION TO DISMISS PLAINTIFF AMERICA’S KIDS, LLC’S COMPLAINT BY
DEFENDANT ZURICH AMERICAN INSURANCE COMPANY**

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Defendant Zurich American Insurance Company moves to dismiss with prejudice the complaint of Plaintiff America’s Kids, LLC. In support of this Motion, Zurich relies on the accompanying Brief, Request for Incorporation by Reference and for Judicial Notice, and the Declaration of Bronwyn F. Pollock and the exhibits attached thereto, all of which are filed concurrently herewith; all of the pleadings and papers on file in this action; all matters of which this Court may take judicial notice; and on such other and further oral or documentary evidence as may be presented to the Court at or prior to the hearing on this Motion.

Dated: September 21, 2020

By: /s/ Debra Bogo-Ernst
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