

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ROBERT E. LEVY, D.M.D., LLC; )  
VANESSA N. KELLER D.M.D. & TRISHA )  
M. YOUNG D.M.D., P.C.; RIVKA )  
GOLDENHERSH D.M.D., LLC; and )  
FARHAD MOSHIRI, AND MAZYAR )  
MOSHIRI, D.M.D., M.S., P.C., dba Moshiri )  
Orthodontics, on behalf of themselves and all )  
others similarly situated, )

Plaintiffs, )

v. )

HARTFORD FINANCIAL SERVICES )  
GROUP INC., DBA THE HARTFORD, )  
HARTFORD CASUALTY INSURANCE )  
COMPANY, SENTINEL INSURANCE )  
COMPANY, LIMITED and TWIN CITY )  
FIRE INSURANCE COMPANY )

Defendants. )

Case No.: 4:20-cv-00643-SRC

**ORAL ARGUMENT REQUESTED**

**DEFENDANT HARTFORD FINANCIAL SERVICES GROUP, INC.’S  
MOTION TO DISMISS PLAINTIFFS’ AMENDED COMPLAINT UNDER  
RULES 12(b)(1), 12(b)(2), AND 12(b)(6) AND REQUEST FOR ORAL ARGUMENT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), and 12(b)(6), Defendant Hartford Financial Services Group, Inc. (“HFSG”) respectfully moves this Court to dismiss with prejudice the proposed Amended Class Action Complaint of Plaintiffs Robert A. Levy, D.M.D., LLC; Vanessa N. Keller D.M.D. & Trisha M. Young D.M.D., P.C.; Rivka Goldenhersh D.M.D., LLC; and Farhad Moshiri and Mazyar Moshiri, D.M.D., M.S., P.C., dba Moshiri Orthodontics for lack of Article III standing, lack of personal jurisdiction, and failure to state a claim upon which relief can be granted. In support of this Motion, HFSG submits the accompanying Memorandum of Law.

HFSG respectfully requests an oral argument on this Motion for the benefit of the Court so that counsel may address any questions the Court has with respect to the Motion and any developments in the law.

Dated: August 14, 2020

Respectfully submitted,

By: /s/ Patrick J. Kenny

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***Attorneys for Hartford Financial Services Group,  
Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of August 2020, I electronically filed the foregoing with the Clerk of Court using the CM/EC system, which sent notification of such filing to the following:

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/s/ Patrick J. Kenny  
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