

Reply in Support of Defendants' Motion to Dismiss

5. It does not appear that Plaintiff has provided any substantive resistance to the Motion to Dismiss.

6. Plaintiff appears to resist Defendants' Motion to Dismiss by stating she will file an Amended Complaint at some point in the future.

7. Plaintiff also appears to make numerous new factual allegations in her March 15 filing.

8. Neither of these statements are relevant to the Motion to Dismiss.

9. The Motion to Dismiss should be evaluated in light of allegations on the face of pleadings that have been filed—not those that Plaintiff says will be filed in the future, or new allegations contained within a motion.

Response to Plaintiff's Omnibus Motion

10. Defendants resist Plaintiff's Motion to Continue.

11. Defendants do not take a position on all other requests or Motions in Plaintiff's March 15 filing.

12. The Motion to Continue is not ripe and should be denied.

13. Any request to continue the proceedings is not ripe because there are no pending in-person proceedings.

14. Moreover, Plaintiff has demonstrated an ability to ably file documents from London.

15. Plaintiff is not entitled to a *carte blanche* extension of court deadlines because she now finds the lawsuit that she filed to be inconvenient.

16. It would be extremely prejudicial to Defendants to allow this matter to continue to hang over their heads because of the Plaintiff's travel schedule.

17. Defendants request expeditious resolution of these Motions, as well as the case as a whole.

Dated: March 19, 2024

[Redacted] _____
(# [Redacted])

of

[Redacted]

Email: pesker@bradley.com

ATTORNEY FOR DEFENDANTS

Copy to:

ALEXANDRA WILSON
[Redacted]
AMES, IA 50014-3736

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of this document was served upon the persons listed on this document at the addresses indicated on EDMS by transmitting a copy via USPS on March 19, 2024. I declare under penalty of perjury that the foregoing is true and correct.

/s/James Phan _____