

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SCHENKER AG,

Plaintiff,

v.

SOCIÉTÉ AIR FRANCE, KONINKLIJKE
LUCHTVAART MAATSCHAPPIJ N.V.,
MARTINAIR HOLLAND N.V., CARGOLUX
AIRLINES INTERNATIONAL S.A., NIPPON
CARGO AIRLINES CO., LTD., ALL NIPPON
AIRWAYS CO., LTD., QANTAS AIRWAYS
LIMITED, and SAS CARGO GROUP A/S.

Defendants.

Case No. 14-CV-04711 (JG) (VVP)

**ORAL ARGUMENT
SCHEDULED FOR
FEBRUARY 27, 2015
AT 10:30 A.M.**

**NOTICE OF QANTAS AIRWAYS LIMITED'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE THAT Defendant Qantas Airways Limited ("Qantas"), upon the accompanying Memorandum of Law in Support of Qantas Airways Limited's Motion to Dismiss based on the Statute of Limitations dated January 9, 2015; Notice of Qantas Airways Limited's Motion to Request Judicial Notice dated January 9, 2015; Qantas Airways Limited's Memorandum in Support of Motion to Request Judicial Notice dated January 9, 2015; the Declaration of Ishai Mooreville in Support of Qantas Airways Limited's Request for Judicial Notice dated January 9, 2015 and accompanying Exhibits; and all other papers and proceedings herein, will move this Court, before the Honorable John Gleeson, United States District Judge, at the U.S. District Courthouse, 225 Cadman Plaza East, Brooklyn, New York, on February 27, 2015 at 10:30 a.m., for an order granting Qantas' Motion to Dismiss based on the statute of

limitations and dismissing Schenker AG's Complaint as to Qantas, and for such other and further relief as the Court deems just and proper.

Dated: January 9, 2015

Respectfully submitted,

/s/ W. Todd Miller

W. Todd Miller (admitted pro hac vice)

Ishai Mooreville (admitted pro hac vice)

Baker & Miller PLLC

2401 Pennsylvania Ave, NW, Suite 300

Washington, DC 20037

202-663-7820

Fax: 202-663-7849

Email: TMiller@bakerandmiller.com

Email: IMooreville@bakerandmiller.com

Counsel for Qantas Airways Limited

Certificate of Service

I, Ishai Mooreville, hereby certify that on January 9, 2015, true and correct copies of the following documents were served via the Court's ECF system upon all counsel registered for ECF in this case: the Notice Of Qantas Airways Limited's Motion To Dismiss Plaintiff's Complaint dated January 9, 2015; the Memorandum of Law in Support of Qantas Airways Limited's Motion to Dismiss based on the Statute of Limitations dated January 9, 2015; Notice of Qantas Airways Limited's Motion to Request Judicial Notice dated January 9, 2015; Qantas Airways Limited's Memorandum in Support of Motion to Request Judicial Notice dated January 9, 2015; the Declaration of Ishai Mooreville in Support of Qantas Airways Limited's Request for Judicial Notice dated January 9, 2015 and accompanying Exhibits.

Dated: January 9, 2015

Signed: /s/ Ishai Mooreville
Ishai Mooreville