UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Anderson News, L.L.C. and Anderson Services, L.L.C.

Plaintiffs,

Piaimilis,

American Media, Inc. et al.,

v.

Defendants.

09 CIV. 2227 (PAC)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the Memorandum of Law submitted herewith, defendant Hudson News Distributors, L.L.C. ("Hudson News"), by its undersigned attorney, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, at a time and date to be determined by this Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for an order dismissing Plaintiffs Anderson News, L.L.C. and Anderson Services, L.L.C.'s (collectively "Anderson") Complaint for failure to state a claim.

The Complaint does not suffice to state a claim under the Sherman Act or under New York common law. The Complaint does not state a claim under the Sherman Act against Hudson News because it fails to allege that Hudson News entered into an agreement to restrain trade and because the allegations of conspiracy are wholly implausible. The Complaint also fails to state claims for defamation, tortious interference, and civil conspiracy under New York common law. Therefore, Hudson News respectfully requests that the Court dismiss the claims in Anderson's Complaint.

PLEASE TAKE FURTHER NOTICE that, pursuant to the schedule established by the Honorable Paul A. Crotty, answering papers, if any, are to be served on counsel for the defendant on January 19, 2010, and reply papers, if any, are required to be served on February 2, 2010.

Dated: December 14, 2009

Respectfully Submitted, Hudson News Distributors, LLC

GIBSON, DUNN & CRUTCHER LLP

By:

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