

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SHIRLEY SHERROD,)	Case No. 1:11-cv-00477-RJL
Plaintiff,)	
)	<u>(Oral Argument Requested)</u>
v.)	
)	
ANDREW BREITBART, LARRY)	
O’CONNOR, and JOHN DOE,)	
Defendants.)	

**JOINT SPECIAL MOTION BY DEFENDANTS ANDREW BREITBART AND LARRY
O’CONNOR TO DISMISS COMPLAINT UNDER THE ANTI-SLAPP ACT OF 2010**

Defendants Andrew Breitbart (“Breitbart”) and Larry O’Connor (“O’Connor”), by and through their respective undersigned counsel, hereby jointly move to dismiss this action pursuant to Section 3 of the Anti-Strategic Lawsuits Against Public Participation (“SLAPP”) Act of 2010, 58 D.C. Reg. 741 (effective March 31, 2011) on the grounds that the speech at issue in the Plaintiff’s Complaint arises from an act in furtherance of the right of advocacy on issues of public interest, and the Plaintiff cannot demonstrate that her Complaint is likely to succeed on the merits.

In support of this motion, Breitbart and O’Connor rely upon their Joint Memorandum of Points and Authorities in Support of Defendants’ Special Motion to Dismiss, filed contemporaneously with this motion. Breitbart and O’Connor respectfully request oral argument.

This the 18th day of April, 2011.

Respectfully submitted,

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