

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

JOSEPH FARAH, JEROME CORSI,
WORLDNETDAILY.COM, and WND
BOOKS,

Plaintiffs,

vs.

ESQUIRE MAGAZINE, INC., HEARST
COMMUNICATIONS, INC. and MARK
WARREN,

Defendants.

Civil Action No. 1:11-cv-001179 (RMC)

**SPECIAL MOTION TO DISMISS AND MOTION TO DISMISS THE COMPLAINT
BY DEFENDANTS HEARST COMMUNICATIONS, INC. AND MARK WARREN**

Defendants Hearst Communications, Inc. (publisher of Esquire Magazine) and Mark Warren (collectively, “Esquire”), by and through their respective undersigned counsel, hereby move to dismiss the Complaint in this action pursuant to D.C. Code § 16-5501, *et seq.* (the Anti-SLAPP statute) on the grounds that the speech challenged in the Complaint arises from an act in furtherance of the right of advocacy on issues of public interest, and Plaintiffs cannot demonstrate that they are likely to succeed on the merits of their claims.

Esquire further moves to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6) on the grounds that the Plaintiffs’ Complaint fails to state a claim upon which relief may be granted.

In support of these motions, Esquire relies upon their Memorandum of Points and Authorities in Support of the Special Motion to Dismiss and Motion to Dismiss Plaintiffs’ Complaint, and the Declaration of Kristina E. Findikyan, filed contemporaneously herewith.

Esquire respectfully requests oral argument.

This the 26th day of August, 2011.

Respectfully submitted,

/s/ Laura R. Handman

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-and-

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