

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

BRADLEE DEAN and YOU CAN RUN BUT YOU CANNOT HIDE INTERNATIONAL	)	
Plaintiffs,	)	Civil Action No. 1:12-cv-00283 (RJL)
v.	)	
NBC UNIVERSAL (NBC), MSNBC and RACHEL MADDOW,	)	
Defendants.	)	

**SPECIAL MOTION TO DISMISS PURSUANT TO D.C. ANTI-SLAPP ACT OF 2010  
AND MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(B)(6)**

Defendants NBC Universal, MSNBC and Rachel Maddow (collectively “NBCUniversal”), by and through their respective undersigned counsel, hereby move to dismiss the Complaint in this action pursuant to the District of Columbia Anti-SLAPP Act of 2010, D.C. Code § 16-5501, et seq., 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. NBCUniversal 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, NBCUniversal relies upon its Memorandum of Points and Authorities and the Declaration of Laura R. Handman with attached exhibits, filed contemporaneously herewith.

NBCUniversal respectfully requests oral argument.

Dated: April 16, 2012

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

Laura Handman /s/

Laura R. Handman (D.C. Bar No. 444386)  
John Rory Eastburg (D.C. Bar No. 984434)  
1919 Pennsylvania Ave., N.W., Suite 800  
Washington, D.C. 20006-3401  
(202) 973-4200  
laurahandman@dwt.com  
roryeastburg@dwt.com

Susan Weiner (pro hac vice pending)  
Chelley E. Talbert (pro hac vice pending)  
NBCUniversal Media, LLC  
30 Rockefeller Plaza  
New York, New York 10112-0002  
(212) 664-2806  
susan.weiner@nbcuni.com  
chelley.talbert@nbcuni.com

*Attorneys for Defendants NBC Universal, MSNBC  
and Rachel Maddow*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 16th day of April 2012, the foregoing Motion, Memorandum of Points and Authorities, Declaration of Laura R. Handman with Exhibits, and Proposed Order were electronically filed through the Court's electronic filing system. In addition, I directed that true and correct copies of the foregoing documents be served by hand on April 17, 2012 upon the following:

Larry Klayman, Esq.  
2020 Pennsylvania Ave., N.W., Suite 345  
Washington, D.C. 20006  
(310) 595-0800

Laura Handman /s/  
Laura R. Handman  
(D.C. Bar No. 444386)