

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE JPMORGAN CHASE & CO.
DERIVATIVE LITIGATION

Master Case No. 1:23-cv-03903-JSR

DERIVATIVE ACTION

**DEFENDANT JAMES E. STALEY'S NOTICE OF MOTION TO
DISMISS THE AMENDED STOCKHOLDER DERIVATIVE COMPLAINT**

Pursuant to Rules 12(b)(6) and 23.1(b) of the Federal Rules of Civil Procedure, Defendant James E. Staley hereby respectfully requests that the Court dismiss all claims in the Complaint filed by Plaintiffs on behalf of Nominal Defendant JPMorgan Chase & Co. The reasons supporting Mr. Staley's motion are set forth in the corresponding Memorandum of Law.

In accordance with the Court's Case Management Plan, ECF No. 16, this response to Plaintiffs' Complaint is filed by July 6, 2023. Per the same order, Plaintiffs' response to this motion is due by July 20, 2023; and Defendants' reply briefs, if any, are due by July 29, 2023.

Date: July 6, 2023

Respectfully submitted,

/s/ John McNichols

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