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Joshua Koltun (Bar No. 173040)  
One Sansome Street  
Suite 3500, No. 500  
San Francisco, California 94104  
Telephone: 415.680.3410  
Facsimile: 866.462.5959  
joshua@koltunattorney.com

Attorney for Doe Defendant

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO

WINELAND-THOMSON ADVENTURES,  
INC. d/b/a THOMSON SAFARIS, a  
Massachusetts corporation,

Plaintiff,

v.

DOES 1 through 10, inclusive,.

Defendants.

Case No. CGC-13-528871

**DOE DEFENDANTS' NOTICE OF MOTION  
AND SPECIAL MOTION TO STRIKE**

Date: June 17, 2013  
Time: 9:30 a.m.  
Dept.: Dept. 302  
Judge: Hon. Marla J. Miller

Filed herewith:

MPA in Support of Demurrer  
Req. Jud. Notice Supp Demurrer Mot. Strike.  
Notice of Motion and Special Motion to Strike  
MPA in Support of Special Motion to Strike  
Proposed Order Sustaining Demurrer  
Proposed Order Granting Motion to Strike

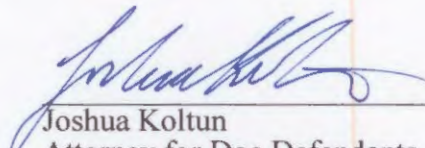
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TO ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that at 9:30 a.m. on June 17, 2013, or as soon thereafter as this matter may be heard in Department 302 of the above-entitled court, Doe Defendants will and hereby do move the Court to strike the Complaint under California Code of Civil Procedure section 425.16. The motion is made on the grounds that the Complaint does not specify with sufficient clarity which statements it is alleging to be false, that the statements constitute privileged "fair reports" under California Civil Code section 47(d); that the statements are protected as opinion under the First Amendment, that Plaintiff has failed to put forth *prima facie* evidence showing that any statement specifically challenged in the Complaint is false, or that any statement susceptible of being proven true or false, made on the Website, was false; and has also failed to put forth *prima facie* evidence showing that any statement was made with actual malice, or that it suffered any actual losses or damages as a result of any actionable statement, or that it is entitled to any remedy whatsoever.

The Motion is based on the Memorandum of Points and Authorities in support thereof, Memorandum of Points and Authorities in Support of the Demurrer, and the Request for Judicial Notice filed herewith and on all the pleadings, papers and records in this action.

DATED: May 17, 2013

  
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Joshua Koltun  
Attorney for Doe Defendants