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Attorneys for Defendants
COUNTY OF LOS ANGELES, THE
DEPARTMENT OF CHILDREN AND
FAMILY SERVICES, and THE
DEPARTMENT OF MENTAL HEALTH

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

OCEAN S., *et al.*,
Plaintiffs,
v.
LOS ANGELES COUNTY, *et al.*,
Defendants.

CASE NO. 2:23-cv-06921-JAK-E

**COUNTY DEFENDANTS' NOTICE
OF MOTION AND MOTION TO
DISMISS FOR FAILURE TO
STATE A CLAIM UNDER
FEDERAL RULE OF CIVIL
PROCEDURE 12(b)(6)**

*Filed Concurrently with Memorandum
of Points and Authorities; Request for
Judicial Notice; and Declaration of
Farbod Moridani*

Assigned to Hon. John A. Kronstadt

Hearing Date: Jan. 27, 2025
Hearing Time: 8:30 a.m.
Action Filed: Aug. 22, 2023
Second Am. Compl.: Aug. 16, 2024
Trial Date: Not Set

TO ALL PARTIES AND TO THEIR ATTORNEYS OR RECORD:

PLEASE TAKE NOTICE THAT that, on January 27, 2025 at 8:30 a.m. or as soon thereafter as the matter may be heard before the Honorable John A. Kronstadt, United States District Judge, in the United States District Court, Central District of California, Courtroom 10C, located at First Street Courthouse, 350 West 1st Street, Los Angeles, California 90012, Defendants the County of Los Angeles, the Department of Children and Family Services, and the Department of Mental Health (together, the “County Defendants”) move for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Third, Fourth, Fifth, Sixth, Seventh, and Eighth causes of action (the “Motion”) asserted in Plaintiffs’ Second Amended Complaint ((Dkt. 130-1 (“SAC”)) on the grounds that the SAC fails to state a claim upon which relief can be granted.

The Motion is made following the conference of counsel pursuant to L.R. 7-3, which took place on September 13, 2024.

The Motion is based on this Notice of Motion and Motion to Dismiss, the Memorandum of Points and Authorities in Support of the Motion, the County Defendants’ Request for Judicial Notice, the Declaration of Farbod S. Moridani and exhibits thereto, all pleadings and papers on file in this action, and any other arguments to be presented at the hearing on this Motion.

DATED: September 23, 2024 MILLER BARONDESS, LLP

By: _____


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Attorneys for Defendants
County of Los Angeles, the Department
of Children and Family Services, and the
Department of Mental Health