

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**PAUL FELLER and
ICARO MEDIA GROUP, INC.**

Defendants.

Hon. Jesse M. Furman

Civ. Action No. 1:24-cv-02896-JMF

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law in Support, and upon all prior pleadings, Paul Feller and Icaro Media Group, Inc., by their undersigned attorneys, will move this Court before The Honorable Jesse M. Furman, U.S. District Court Judge for the Southern District of New York, in Courtroom 1105 at 40 Foley Square, New York, NY, 10007, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b) dismissing the Plaintiff's Complaint as to any and all claims asserted by the Plaintiff against Defendants, and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Local Civil Rule 6.1 of the Southern District of New York, responsive papers, if any, must be served on the undersigned attorneys on July 8, 2024. Reply, if any, will be served on July, 2024.

Dated: New York, New York
June 21, 2024

PULLP

By: /s/Anna Adelstein
Anna Adelstein
Jonathan Uretsky
111 Broadway, 8th Floor
New York, New York 10006
(212) 571-1164
uretsky@pullp.com
adelstein@pullp.com
Attorneys for Defendants