Case Number: PC-2019-3654

Filed in Providence/Bristol County Superior Court

Submitted: 7/2/2020 9:10 AM

Envelope: 2649624 Reviewer: Carol M.

(JUSTICE BRIAN P. STERN)

STATE OF RHODE ISLAND PROVIDENCE, SC.

SUPERIOR COURT

CHARTERCARE COMMUNITY BOARD,

et al.,

:

Plaintiffs

:

v.

C.A. No. PC-2019-3654

SAMUEL LEE, et al.,

:

Defendants

<u>MOTION TO DISMISS BY DEFENDANT JPMORGAN CHASE BANK, N.A.</u>

Pursuant to Rule 12(b)(6) of the Rhode Island Rules of Civil Procedure, Defendant JPMorgan Chase Bank, N.A. ("Defendant") hereby moves to dismiss all counts and claims against JPMC in the Verified First Amended and Supplemental Complaint for failure to state a claim for which relief may be granted.

For the reasons set forth in its accompanying Memorandum of Law, Defendant requests that this Court grant its Motion to Dismiss.

Respectfully submitted,

JPMORGAN CHASE BANK, N.A.

By its Attorneys,

/s/ Mark W. Freel

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of June, 2020, I filed and served this document through the electronic filing system on all counsel of record.

The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Mark W. Freel