

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

SONY UMG MUSIC
ENTERTAINMENT,
ET AL

Plaintiffs,

CASE NUMBER: 07-CV-11446

V.

JOEL TENENBAUM,

Defendant.

DEFENDANT JOEL TENENBAUM'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT
AND MOTION FOR SUMMARY JUDGMENT

NOW COMES Defendant JOEL TENENBAUM, appearing PRO SE, and respectfully moves for an entry of an order, pursuant to Rule 12 (b)(6) of the Federal Rules of Civil Procedure, dismissing the Plaintiffs' Complaint ("Complaint") on the grounds that the Plaintiff have failed to state a claim upon which relief can be granted.

In addition, Defendant JOEL TENENBAUM, appearing PRO SE, and respectfully moves for an entry of an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, dismissing the Plaintiffs' Complaint ("Complaint") on the grounds that no genuine issue of material fact exists.

Joel Tenenbaum also moves for such other and further relief as to which he is entitled.

In support of his motion, Joel Tenenbaum submits his accompanying Memorandum of Law in Support of Defendant's Motion to Dismiss Plaintiffs' Complaint and in Support of Motion for Summary Judgment.

WHEREFORE, Joel Tenenbaum respectfully prays for entry of an order, pursuant to Rule 12 (b)(6) of the Federal Rules of Civil Procedure, dismissing the Plaintiffs' Complaint in its entirety, and/or

an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure on the grounds that no genuine issue of material fact exists, and for such other and further relief as to which he is entitled.

Dated: Boston, Massachusetts
~~October 25, 2007~~

November 17,

Respectfully submitted

By: *Joel Tenenbaum* 11-17-07

JOEL TENENBAUM

Pro Se

1666 Commonwealth Avenue

Brighton, Massachusetts 02135

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been mailed to all attorneys of record on this *17* day of ~~October~~ *November* 2007, addressed as follows:

JOHN R. BAUER
Robinson & Cole, LLP
One Boston Place
Boston, MA 02108

Joel Tenenbaum
JOEL TENENBAUM