



DOUGLAS COUNTY, NEBRASKA

JB & ASSOCIATES, INC., et al.,

Plaintiffs,

vs.

NEBRASKA CANCER COALITION,  
INC., et al.,

Defendants.

) Case No. CI 15-6370  
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Defendants' Motion to Dismiss

Defendants Nebraska Cancer Coalition, Inc. ("NC2"), Dr. Alan G. Thorson, M.D., and Dr. David Watts, M.D. (collectively, "Defendants") pursuant to Nebraska Court Rules of Pleading in Civil Cases 6-1112(b)(6) move the Court to dismiss the Complaint in its entirety on the basis that Plaintiffs have failed to state a claim upon which relief can be granted.

Wherefore, Defendants respectfully request the Court issue an Order dismissing the Complaint pursuant to Rule 6-1112(b)(6) and for other and further relief the Court deems appropriate.

--- SIGNATURE PAGE TO FOLLOW---

#21 FILED  
IN DISTRICT COURT  
DOUGLAS COUNTY NEBRASKA  
SEP 14 2015  
JOHN M. FRIEND  
CLERK DISTRICT COURT

DATED this 14th day of September, 2015.

**Nebraska Cancer Coalition, Inc, Dr. Alan G.  
Thorson, M.D., and Dr. David Watts, M.D.,  
Defendants.**

By: 

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AND

By: /s/ Shawn D. Renner

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*Attorneys for Defendants*


**NOTICE OF HEARING**

You are hereby notified that Defendants will call up their Motion to Dismiss before The Honorable W. Russell Bowie III, Courtroom No. 504, 5th Floor, Douglas County Hall of Justice, 1701 Farnam Street, Omaha, Nebraska 68183, on September 30, 2015, at 11:30 a.m.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent by electronic mail, on this 14th day of September, 2015, addressed as shown below, to the following:

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