

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

KEITH CARROLL,)
)
 Plaintiff,)
)
 v.) Case No. 2:17-cv-00521-MSD-LRL
)
)
 ABNB FEDERAL CREDIT UNION,)
)
)
 Defendant.)

DEFENDANT'S MOTION TO DISMISS THE COMPLAINT

Defendant ABNB Federal Credit Union, by its undersigned counsel, hereby moves this Court for an order dismissing the Complaint *with prejudice*, pursuant to Fed. R. Civ. P. 12(b)(6), for failure to state a claim upon which relief may be granted. The grounds for this motion are set forth in the accompanying Memorandum of Law.

November 9, 2017

Respectfully submitted,

/s/ John M. Bredehoft
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ABNB Federal Credit Union

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of November 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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