

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DR. FARID HAFEZ,

Plaintiff,

v.

DR. LORENZO VIDINO, *et al.*,

Defendants.

No. 1:24-cv-00873 (ABJ)

**MOTION TO DISMISS BY DEFENDANTS ALP SERVICES SA, DILIGENCE SARL,
MARIO BRERO, MURIEL CAVIN, AND LIONEL BADAL**

Pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, Defendants Alp Services SA, Diligence SARL, Mario Brero, Muriel Cavin, and Lionel Badal (collectively, “the European Defendants”) move to dismiss the Amended Complaint (Dkt. 5) because (1) the Court lacks personal jurisdiction over the European Defendants; (2) the Complaint fails to state a claim under the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1961-8; (3) the Complaint fails to state a claim under common law fraud; (4) the Complaint fails to state a claim under unfair or deceptive trade practices; (5) the Complaint fails to state claims for tortious interference with existing and prospective business relations; and (6) the Complaint fails to state a claim for *prima facie* tort.

For these reasons and those set forth in the accompanying memorandum of law, Defendants respectfully request that the Court dismiss the Amended Complaint with prejudice.

Dated: October 18, 2024

By: /s/ Igor V. Timofeyev

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