

Docket No.: FST-CV22-6057408-S

RALPH S. GIORGIO,	:	SUPERIOR COURT
	:	
<i>Plaintiff</i>	:	
v.	:	
	:	
PAUL SCHWARTZ, LAWRENCE	:	J.D. OF STAMFORD AT
GRAEV, JOHN MILAN, REED	:	
SALVATORE, STEN WILSON, ART	:	STAMFORD
LINARES, SANJAY KAMLANI,	:	
FEDERAL TAX AUTHORITY, LLC	:	May 19, 2023
AND DOES 1-100, inclusive	:	
	:	
<i>Defendants</i>	:	

DEFENDANTS' MOTION TO DISMISS

Pursuant to Practice Book §§ 10-30(a)(2), (a)(4), and Connecticut General Statutes Sections 52-45a, 52-46, 52-46a, 52-48(a), 52-50(a)-(b), 52-57(a), 52-57a, and 52-59b, Defendants Paul Schwartz, Lawrence Graev, John Milan, Reed Salvatore, Sten Wilson, Art Linares, Sanjay Kamlani (collectively, the “Individual Defendants”) and Federal Tax Authority, LLC (“FTA,” and collectively with the Individual Defendants, “Defendants”) hereby move to dismiss this action with prejudice based upon lack of personal jurisdiction over Defendants and insufficient service of process. The factual and legal bases for dismissal are discussed in greater detail in the accompanying Memorandum of Law in Support of this Motion.

Dated: New York, New York
May 19, 2023

By: /s/ Joshua A. Siegel
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Art Linares, Sanjay Kamlani, and
Federal Tax Authority, LLC*

CERTIFICATION OF SERVICE

I hereby certify, pursuant to Practice Book §§ 10-12 through 10-17 that a copy of the above was mailed via first class mail postage pre-paid on May 19, 2023 or e-mailed to counsel of record for Plaintiff:

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By: /s/ Joshua A. Siegel
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