

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

MARY REIDT, on behalf of the Frontier Communications 401(k) Savings Plan and all others similarly situated,

Plaintiff,

v.

FRONTIER COMMUNICATIONS CORPORATION,
et al.,

Defendants.

Civil Action No. 3:18-cv-01538-RNC

Hon. Robert N. Chatigny

DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12(b)(1) and (6), Defendants Frontier Communications Corporation and the Retirement Investment & Administration Committee respectfully move to dismiss Plaintiff's Complaint with prejudice for lack of jurisdiction, for failure to state a claim upon which relief can be granted, and pursuant to the applicable statute of repose, 29 U.S.C. § 1113.

This motion is based upon the supporting memorandum of law, the accompanying request for judicial notice, and the exhibits attached thereto.

Dated: April 19, 2019

Respectfully submitted,

/s/ Brian D. Netter

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ORAL ARGUMENT REQUESTED

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ORAL ARGUMENT REQUESTED

CERTIFICATE OF SERVICE

I hereby certify that, on April 19, 2019, a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will provide notice of the filing to all counsel of record.

By: /s/ *Brian D. Netter*

Brian D. Netter