

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

SERGIO NAVARRO, THERESA
GAMAGE, DAYLE BULLA, and JANE
KINSELLA, on their own behalf, on
behalf of all others similarly situated, and
on behalf of the Wells Fargo & Company
Health Plan and its component plans,

Plaintiffs,

v.

WELLS FARGO & COMPANY,
MICHAEL BRANCA, MARK
HICKMAN, DREW WINELAND,
DAVID GALLOREESE, BEI LING, and
DOES 1-20,

Defendants.

No. 0:24-cv-03043-KMM-DTS

**NOTICE OF DEFENDANT WELLS FARGO & COMPANY'S MOTION
TO DISMISS THE CLASS ACTION COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) and the Local Rules of this Court, Defendant Wells Fargo & Company¹ moves to dismiss Plaintiffs' Class Action Complaint in its entirety. The grounds for this motion are set forth in Defendant Wells Fargo & Company's Memorandum of Law in Support of its Motion to Dismiss the Complaint, all supporting materials filed contemporaneously therewith, and

¹ The individually named Defendants were voluntarily dismissed from the case pursuant to a joint stipulation. (ECF No. 27.)

arguments of counsel, as well as all the files, records, submissions, and proceedings in this matter.

Dated: September 27, 2024

Respectfully submitted,

PROSKAUER ROSE LLP

By: /s/ Russell L. Hirschhorn

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