

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

RONALD FRIEDMAN, as trustee for the SportCo
Creditors' Liquidation Trust,

Plaintiff,

v.

WELLSPRING CAPITAL MANAGEMENT,
LLC, WELLSPRING CAPITAL PARTNERS IV,
L.P., WCM GENPAR IV, L.P., WCM GENPAR
IV GP, LLC, ALEXANDER E CARLES,
BRADLEY JOHNSON, F. HEWITT GRANT,
CHARLES E. WALKER, JR., TODD BOEHLY,
BERNARD ZIOMEK, and ANDREW KUPCHIK,

Defendants.

Adversary No. 19-80071-dd

**DEFENDANT BRADLEY JOHNSON'S NOTICE OF MOTION AND MOTION TO
DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT**

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law in Support of Defendant Bradley Johnson's Motion to Dismiss, the Declaration of George B. Adams, dated February 19, 2020, together with the exhibits attached thereto, and such additional material and arguments as the Court may consider, Mr. Johnson will move this Court before the Hon. David R. Duncan, Chief Judge for the United States Bankruptcy Court for the District of South Carolina, on a date and time to be determined by the Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and Rule 7012(b)(6) of the Federal Rules of Bankruptcy Procedure dismissing the First Amended Complaint's Third Cause of Action for negligent misrepresentation against Mr. Johnson with prejudice.

DATED: February 19, 2020

Respectfully submitted,

/s/ Daniel H.R. Laguardia
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