

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**

NEELIE PANOZZO, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: 2:21-cv-02292-CSB-EIL
)	
RIVERSIDE HEALTHCARE, et al.)	
)	
Defendants.)	

**DEFENDANTS’ MOTION TO DISMISS
PLAINTIFFS’ SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendants, Riverside Healthcare (“Riverside”) and Phillip M. Kambic (“Kambic”) (collectively, “Defendants”), by and through their attorneys, respectfully move this Court to dismiss Plaintiffs’ Second Amended Complaint for failure to state a plausible claim. In support of this Motion, Defendants rely upon the contemporaneously filed Memorandum of Law in Support of Their Motion to Dismiss Plaintiffs’ Second Amended Complaint

Dated: January 14, 2022

Respectfully Submitted,

RIVERSIDE HEALTHCARE AND
PHILLIP M. KAMBIC

/s/ Michael R. Phillips
One of their Attorneys

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CERTIFICATE OF SERVICE

I certify that on January 14, 2022, I filed and served the foregoing document through the Court's electronic filing system, which will serve notice upon all counsel of record.

/s/ Michael R. Phillips

Michael R. Phillips
McGuireWoods LLP