United States Courts
Southern District of Texas
FILED
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Michael N. Milby, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE ENRON CORPORATION SECURITIES LITIGATION	)))	No. H-01-3624 Hon. Melinda Harmon

DEFENDANTS ANDERSEN-UNITED KINGDOM'S AND ANDERSEN-BRAZIL'S
MOTION TO DISMISS THE CONSOLIDATED COMPLAINT

Defendants Andersen-United Kingdom and Andersen-Brazil, by their attorneys, respectfully move this Court for an order dismissing the Consolidated Complaint. In support thereof, Andersen-United Kingdom and Andersen-Brazil state the following grounds:

1. Plaintiffs have failed to serve Andersen-United Kingdom and Andersen-Brazil properly. See Fed. R. Civ. P. 12(b)(5).

2. This Court lacks personal jurisdiction over Andersen-United Kingdom and Andersen-Brazil because they have not had the "minimum contacts" with the United States or Texas to provide such jurisdiction and because finding jurisdiction over them would offend "traditional notions of fair play and substantial justice." See Fed. R. Civ. P. 12(b)(2).

3. Andersen-United Kingdom and Andersen-Brazil hereby expressly incorporate their memorandum in support of this motion, which they are filing contemporaneously.

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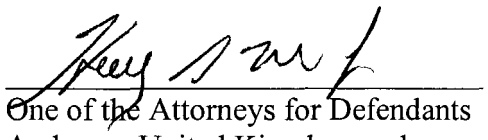
WHEREFORE, Defendants Andersen-United Kingdom and Andersen-Brazil respectfully request this Court to enter an order dismissing the Consolidated Complaint against them with prejudice.

Respectfully submitted,



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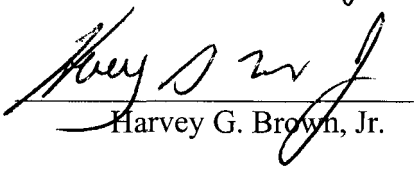
Dated: May 8, 2002

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing instrument has been forwarded to all counsel of record on the attached Service List pursuant to the Court Order dated April 10, 2002 on this the 8th day of ~~April~~ May, 2002.



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