

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES COURTS  
SOUTHERN DISTRICT OF TEXAS  
FILED

MAY 8 2002

IN RE ENRON CORPORATION )  
SECURITIES LITIGATION )  
)

No. H-01-3624

Hon. Melinda H.

MICHAEL N. MILBY, Clerk of Court

**DEFENDANT ANDERSEN WORLDWIDE SOCIETE COOPERATIVE'S  
MOTION TO DISMISS THE CONSOLIDATED COMPLAINT**

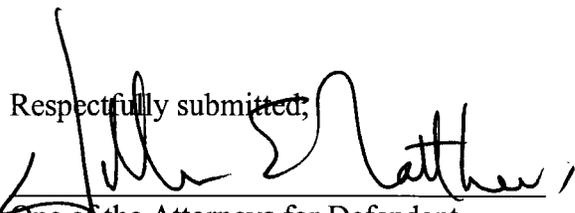
Defendant Andersen Worldwide Societe Cooperative ("AWSC"), by its attorneys, respectfully moves this Court for an order dismissing the Consolidated Complaint. In support thereof, AWSC states the following grounds:

1. This Court lacks personal jurisdiction over AWSC and, in any event, alternatively should decline to exercise personal jurisdiction over AWSC, because Swiss law does not recognize this Court's jurisdiction over AWSC. See Fed. R. Civ. P. 12(b)(2).

2. The Consolidated Complaint fails to state a claim upon which relief can be granted. See Fed. R. Civ. P. 12(b)(6). Plaintiffs have failed to allege that AWSC engaged in any actionable conduct or that it should be held liable for the actions of any of the other defendants.

3. AWSC hereby expressly incorporates the memorandum in support of this motion, which it is filing contemporaneously.

WHEREFORE, Defendant Andersen Worldwide Societe Cooperative respectfully requests this Court to enter an order dismissing the Consolidated Complaint against it with prejudice.

Respectfully submitted,  
  
One of the Attorneys for Defendant  
Andersen Worldwide Societe Cooperative

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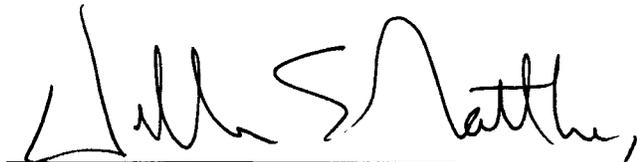
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Counsel for Defendant Andersen Worldwide  
Societe Cooperative

Dated: May 8, 2002

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been forwarded to all interested parties on this 8<sup>th</sup> day of May, 2002.

  
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William E. Matthews