



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV251 LG JMR

AARON F. BROUSSARD, DANIEL ABEL,
CHARLES LEARY, VAUGHN PERRET,
CHRIS YOUNT, TROUT POINT LODGE
LIMITED, NOVA SCOTIA ENTERPRISES, LLC

DEFENDANTS

MOTION TO DISMISS OF DEFENDANT, NOVA SCOTIA ENTERPRISES, LLC

COME NOW Defendant NOVA SCOTIA ENTERPRISES, LLC and file this their motion pursuant to Federal Rules of Civil Procedure 12 to dismiss the Complaint filed against them; and in support would show the Court lacks subject matter jurisdiction, the Court lacks personal jurisdiction, the venue is improper, and Plaintiff fails to state a claim upon which relief can be granted.

Defendant NOVA SCOTIA ENTERPRISES, LLC therefore moves the Court to dismiss the Complaint with prejudice.

RESPECTFULLY SUBMITTED this the 18 day of June, 2013.

NOVA SCOTIA ENTERPRISES, LLC

By:


RONALD J. VEGA

CERTIFICATE OF SERVICE

I, RONALD J. VEGA, do hereby certify that I have sent a true and correct copy of the foregoing Motion to Dismiss by via U.S. Mail to:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520
VIA UNITED STATES MAIL

This the 19 day of June, 2013.



RONALD J. VEGA

RONALD J. VEGA
3329 Florida Ave.
Kenner, LA 70065
Telephone: (504) 469-6699
Facsimile: (504) 8467-1866