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2 CALIFORNIA ANTI-SLAPP PROJECT
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6 Special Counsel for Defendants
TAI JING, JIA MA, and YELP! INC.
(sued herein as YELP.COM)
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8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 IN AND FOR THE COUNTY OF SANTA CLARA
10 UNLIMITED JURISDICTION

11 YVONNE WONG,
12 Plaintiff,
13 vs.
14 TAI JING, JIA MA, YELP.COM, and
DOES 1 through 20, inclusive,
15 Defendants.
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Case No. 1-08-CV-129971

NOTICE OF MOTION AND SPECIAL
MOTION TO STRIKE THE COMPLAINT AS
A MERITLESS SLAPP FILED BY
DEFENDANTS TAI JING, JIA MA, AND
YELP! INC. (SUED HEREIN AS YELP.COM)
(C.C.P. § 425.16)

Complaint Filed: December 11, 2008
Date: March 17, 2009
Time: 9:00 a.m.
Department: 5
Judge: Hon. Mary Jo Levinger

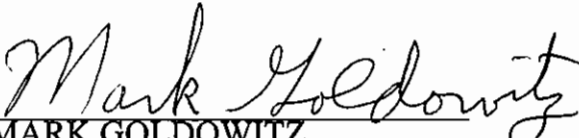
[Filed in conjunction with memorandum of points
and authorities, proof of service of moving
papers; and index of declarations and declarations
of Jeremy Stoppelman and Paul Clifford (to be
filed separately)]

FILED BY FAX

1 **NOTICE OF MOTION AND SPECIAL MOTION TO STRIKE THE COMPLAINT**
2 **TO PLAINTIFF AND HER ATTORNEYS:**

3 Please take notice that on March 17, 2009, at 9:00 a.m., or as soon thereafter as counsel
4 may be heard, in Santa Clara County Superior Court, Department 5, 191 N. First Street, San
5 Jose, California, defendants Tai Jing, Jia Ma, and Yelp! Inc. (sued herein as Yelp.com)
6 (“defendants”) will and hereby do specially move the Court for an order striking and dismissing
7 with prejudice her Complaint as to defendants, a finding that defendants are entitled to an award
8 of attorneys’ fees and costs in an amount to be proven, and for other appropriate relief. This
9 special motion to strike will be and hereby is made pursuant to section 425.16 of the Code of
10 Civil Procedure, on the grounds that the claims against defendants arise from their acts or
11 alleged acts in furtherance of their constitutional rights of speech and petition, and that plaintiff
12 cannot establish a probability of prevailing on her claims. This special motion to strike will be
13 based on this notice of motion and special motion to strike, the memorandum of points and
14 authorities, the declarations and exhibits which are being or will be filed in support thereof, all
15 other materials on file herein, and on such other and further matters as the Court may consider at
16 the hearing.

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18 DATED: January 21, 2009


19 **MARK GOLDOWITZ**
20 **CALIFORNIA ANTI-SLAPP PROJECT**
21 **Special Counsel for Defendants TAI JING, JIA MA,**
22 **and YELP! INC. (sued herein as YELP.COM)**
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