UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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AMY TUTEUR, M.D., Plaintiff,

v.

GINA CROSLEY-CORCORAN, Defendant.

C.A. No. 13-cv-10159-RGS

DEFENDANT'S MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(2)

Pursuant to Fed. R. Civ. P. 12(b)(2), defendant Gina Crosley-Corcoran respectfully moves for the dismissal of the Plaintiff's Complaint in its entirety. In support of this Motion, Ms. Crosley-Corcoran states that she is not subject to jurisdiction under the Commonwealth's long-arm statute, nor would an exercise of jurisdiction over her comport with the due process requirements of the United States Constitution. In further support, Ms. Crosley-Corcoran relies on the accompanying Memorandum of Law.

Respectfully submitted,

GINA CROSLEY-CORCORAN

By her attorney,

/s/ Evan Fray-Witzer Evan Fray-Witzer (BBO# 564349) Ciampa Fray-Witzer, LLP 20 Park Plaza, Suite 505 Boston, MA 02116 Tel: (617) 426-0000 Fax: (617) 423-4855 Evan@CFWLegal.com

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 5, 2013.

/s/ Evan Fray-Witzer