

UNITED STATES FEDERAL COURT  
SOUTHERN DISTRICT OF NEW YORK

RODNEY JONES,

Plaintiff,

v.

SEAN COMBS,  
JUSTIN DIOR COMBS  
CUBA GOODING JR.,  
LUCIAN CHARLES GRAINGE,  
KRISTINA KHORRAM,  
LOVE RECORDS,  
MOTOWN RECORDS,  
UNIVERSAL MUSIC GROUP,  
COMBS GLOBAL ENTERPRISES,  
JOHN and JANE DOES 1-10 and  
ABC CORPORATIONS. 1-10

Defendants.

Case Number: 24-1457

**Notice Of Motion For Dismissal Of All  
Claims and Allegations Against Lucian  
Charles Grainge, Motown Records and UMG  
Recordings, Inc. (Incorrectly named as  
Universal Music Group)**

**PLEASE TAKE NOTICE** that, upon the supporting Declaration of Tyrone A. Blackburn dated May 13, 2024, and all prior proceedings heretofore had and all papers filed herein, Plaintiff Rodney Jones will move this Court, at a date and time to be determined by the Court, for an Order, pursuant to Rules 15, 21 and 41 of the Federal Rules of Civil Procedure, dismissing all claims and striking all allegations made against Lucian Charles Grainge, Motown Records, UMG Recordings, Inc. (incorrectly named as Universal Music Group) in the Second Amended Complaint with prejudice and removing Lucian Charles Grainge, Motown Records, UMG Recordings, Inc. (incorrectly named as Universal Music Group) from the caption of this action.

T. A. BLACKBURN LAW, PLLC.  
By: *Tyrone A. Blackburn, Esq.*  
Tyrone A. Blackburn, Esq.  
Attorney for Plaintiff