

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

JOSE AGELO LUNA VANEGAS, On behalf of himself and all others similarly situated,)	
)	
Plaintiff,)	CASE NO.: 3:21-CV-00054
)	
v.)	
)	COLLECTIVE ACTION
)	COMPLAINT PURSUANT
SIGNET BUILDERS, INC.)	TO 29 U.S.C. §216(b)
)	
Defendant.)	

DEFENDANT’S MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12(b)(6), Signet Builders, Inc. (“Defendant” or “Signet”), by and through its undersigned counsel, hereby moves to dismiss Plaintiff’s Complaint for failure to state a claim upon which relief may be granted. The grounds for this Motion are fully set forth in the Memorandum in Support of Defendant’s Motion to Dismiss, which is being filed contemporaneously with this Motion.

Respectfully submitted this 7th day of April, 2021.

/s/Joshua H. Viau

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2021, I electronically filed the foregoing *Defendant's Motion to Dismiss* with the Clerk of Court using the ECF system, which sent notice of the foregoing to counsel of record as follows:

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