

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

_____)	
TERRAN BIOSCIENCES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:22-cv-01956-ELH
)	
COMPASS PATHFINDER LIMITED and)	
DOES 1-10,)	
)	
Defendants.)	
)	
_____)	

COMPASS PATHFINDER LIMITED’S MOTION TO DISMISS

Defendant Compass Pathfinder Limited (“Compass”), by and through the undersigned counsel, hereby moves to dismiss plaintiff Terran Biosciences, Inc.’s (“Terran”) Complaint (Dkt. No. 1) in its entirety. Terran accuses Compass of violating the federal Defend Trade Secrets Act (18 U.S.C. § 1836) and Maryland’s Uniform Trade Secrets Act (Md. Code, Com. Law § 11-1201, *et seq.*) (Counts I and II). Terran also brings a claim for breach of contract against Compass (Count III). As explained more fully in the attached Memorandum of Law, however, the Court lacks personal jurisdiction over Compass, a foreign entity; Terran lacks standing to bring these claims; and in any event, Terran fails to allege sufficient facts to state a plausible claim for relief. These flaws cannot be cured through amendment. Compass therefore respectfully requests that the Court dismiss Terran’s Complaint with prejudice.

Dated: September 29, 2022

Respectfully submitted,

/s/ Jean E. Lewis

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Limited*

REQUEST FOR HEARING

The Defendant, Compass Pathfinder Limited, by and through its counsel of record, and pursuant to Local Rule 105.6, hereby requests a hearing on its Motion to Dismiss.

/s/ Jean E. Lewis

Jean E. Lewis

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of September, 2022, a copy of Defendant Compass Pathfinder Limited's Motion to Dismiss and Memorandum of Law in Support thereof, was filed and served via CM/ECF on all counsel of record.

/s/ Jean E. Lewis

Jean E. Lewis