

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

MICHAEL TULLGREN,

Plaintiff,

v.

BOOZ ALLEN HAMILTON INC., et al.,

Defendants.

Case No: 1:22-cv-856-MSN-IDD

DEFENDANTS' MOTION TO DISMISS THE COMPLAINT

Defendants Booz Allen Hamilton, Inc., the Board of Trustees of Booz Allen Hamilton, Inc., and the Administrative Committee of the Booz Allen Hamilton, Inc. Employees' Capital Accumulation Plan (together, "Defendants"), by and through their undersigned counsel and in accordance with Federal Rule of Civil Procedure 12(b)(6) and E.D. Va. Local Civil Rule 7, hereby move this Court to dismiss Plaintiff's Complaint (Dkt. 1) in its entirety with prejudice.

Defendants set forth the reasons for dismissal in the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint, filed herewith.

Dated: October 10, 2022

Respectfully submitted,

s/ Matthew J. Sharbaugh

Matthew J. Sharbaugh, VSB 91219

Frank H. Williams, III (admitted *pro hac vice*)

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW

Washington, DC 20004

T: (202) 739-3000

F: (202) 739-3001

matthew.sharbaugh@morganlewis.com

frank.williams@morganlewis.com

Jeremy P. Blumenfeld (admitted *pro hac vice*)
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
T: (215) 963-5000
F: (215) 963-5001
jeremy.blumenfeld@morganlewis.com

Sean K. McMahan (admitted *pro hac vice*)
Morgan, Lewis & Bockius LLP
1717 Main St., Suite 3200
Dallas, TX 75201
T: (214) 466-4102
sean.mcmahan@morganlewis.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2022, I caused to be served a true and correct copy of the foregoing on the following counsel of record by the Court's CM/ECF system:

Glenn E. Chappell (Bar No. 92153)
Tycko & Zavareei LLP
1828 L Street NW, Suite 1000
Washington, D.C. 20036
Tel.: (202) 973-0900
Fax: (202) 973-0950
gchappell@tzlegal.com

James C. Shah
Alec J. Berin
Miller Shah LLP
1845 Walnut Street, Suite 806
Philadelphia, PA 19103
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
jcshah@millershah.com
ajberin@millershah.com

James E. Miller
Laurie Rubinow
Miller Shah LLP
65 Main Street
Chester, CT 06412
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
jemiller@millershah.com
lrubinow@millershah.com

Kolin C. Tang
Miller Shah LLP
19712 MacArthur Blvd.
Irvine, CA 92612
Telephone: (866) 540-5505
Facsimile: (866) 300-7367
kctang@millershah.com

s/ Matthew J. Sharbaugh
Matthew J. Sharbaugh, VSB 91219
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, DC 20004
T: (202) 739-3000
F: (202) 739-3001
matthew.sharbaugh@morganlewis.com